

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

19-196J

HENRY UNSELD WASHINGTON
PLAINTIFF

K. DELISMA V Defendants et al.

15BE/KCC

COMPLAINT

RECEIVED

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CLERK, U.S. DISTRICT COURT
WEST. DIST. OF PENNSYLVANIA

I. JURISDICTION AND VENUE

1. THIS IS A CIVIL ACTION AUTHORIZED BY 42 USC SECTION 1983 TO REDRESS THE DEPREVIATION, UNDER THE COLOR OF STATE LAW, OF RIGHTS SECURED BY THE CONSTITUTION OF THE UNITED STATES. THE COURT HAS JURISDICTION UNDER 28 U.S.C. SECTION 1331 AND 1343 (1)(3), PLAINTIFF SEEKS DECLARATORY RELIEF PURSUANT TO 28 U.S.C. SECTION 2201 AND 2202, PLAINTIFF'S CLAIMS FOR INJUNCTIVE RELIEF ARE AUTHORIZED BY 28 USC SECTION 2283 AND 2284 AND RULE 65 OF THE FEDERAL RULES OF CIVIL PROCEDURE
2. THE WESTERN DISTRICT OF PENNSYLVANIA IS AN APPROPRIATE VENUE UNDER 28 U.S.C. SECTION 1391 (2)(A) BECAUSE IT IS WHERE THE EVENTS GIVING RISE TO THIS COMPLAINT OCCURRED

II. PLAINTIFF

3. PLAINTIFF, HENRY UNSELD WASHINGTON, IS AND WAS AT ALL TIMES MENTIONED HEREIN A PRISONER OF THE STATE OF PENNSYLVANIA IN THE CUSTODY OF THE PENNSYLVANIA DEPARTMENT OF CORRECTIONS, HE IS CURRENTLY CONFINED IN SCI-SOMERSET, IN SOMERSET, PA.

III. DEFENDANTS:

4. DEFENDANT, K. DELISMA, AT ALL TIMES RELEVANT TO THIS COMPLAINT IS THE DOCTOR AND THE MEDICAL DIRECTOR AT SCI-SOMERSET, DOC. HE IS LEGALLY RESPONSIBLE FOR MEDICAL CARE AND THE TREATMENT OF INMATES.
5. DEFENDANT, WILLIAM L. BOWERS, AT ALL TIMES RELEVANT TO THIS COMPLAINT IS THE UNIT MANAGER OF A BLOCK AT SCI-SOMERSET, DOC RESPONSIBLE LEGALLY FOR THE WELFARE OF A BLOCK INMATES.
6. DEFENDANT, PHELLIP MAUST, AT ALL TIMES RELEVANT TO THIS COMPLAINT IS THE CHAPLAIN AT SCI-SOMERSET, DOC. HE IS LEGALLY RESPONSIBLE FOR PROVIDING INMATES ACCESS TO RELIGIOUS PRACTICE.
7. HEIDI SROKA, AT ALL TIMES RELEVANT TO THIS COMPLAINT IS THE GRIEVANCE COORDINATOR AT SCI-SOMERSET DOC, SHE IS LEGALLY RESPONSIBLE FOR DUE PROCESS OF THE GRIEVANCE PROCESS.
8. DEFENDANT, ROBERT SNYDER, AT ALL TIMES RELEVANT TO THIS COMPLAINT IS THE CAPTAIN OF SECURITY AT SCI-SOMERSET, DOC, HE ^{IS LEGALLY} RESPONSIBLE FOR THE SAFETY OF SCI-SOMERSET INMATES.
9. DEFENDANT, REBECCA HOCK, AT ALL TIME RELEVANT TO THIS COMPLAINT IS THE ACTIVITIES SPECIALIST AT SCI-SOMERSET, DOC. SHE IS RESPONSIBLE LEGALLY FOR INMATE SPORT.
10. DEFENDANT, J. BIRNIE, AT ALL TIME RELEVANT TO THIS COMPLAINT IS THE DOCTOR-NAMED MEDICAL DIRECTOR AT SCI-SOMERSET, DOC, HE IS RESPONSIBLE LEGAL FOR MEDICAL CARE OF INMATES.
11. DEFENDANT, ELLIS KAUFFMANT, AT ALL TIMES RELEVANT TO THIS COMPLAINT IS THE PHYSICIAN'S ASSISTANT AT SOMERSET, DOC. HE IS LEGALLY RESPONSIBLE FOR THE MEDICAL CARE OF INMATES.

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12. DEFENDANT, RICHARD IRWIN, AT ALL TIMES RELEVANT TO THIS COMPLAINT IS OPTOMETRIST AT SCI-SOMERSET, DOC. HE IS LEGALLY RESPONSIBLE FOR MEDICAL EYE CARE-N-EYE TREATMENT OF INMATES
13. DEFENDANT, ROXANNE PLAYSO, AT ALL TIMES RELEVANT TO THIS COMPLAINT IS THE PA: PHYSICIANS ASSISTANT AT SCI-SOMERSET, DOC. SHE IS LEGALLY RESPONSIBLE FOR THE MEDICAL CARE OF INMATES
14. DEFENDANT, LARENE DARLING, AT ALL TIMES RELEVANT TO THIS COMPLAINT IS THE NURSE PRACTITIONER AT SCI-SOMERSET, DOC. SHE IS LEGALLY RESPONSIBLE FOR THE MEDICAL CARE OF INMATES
15. DEFENDANT, FETTERMAN, AT ALL TIMES RELEVANT TO THIS COMPLAINT IS THE NURSE PRACTITIONER AT SCI-SOMERSET, DOC. ~~HE~~ ^{HE} IS LEGALLY RESPONSIBLE FOR THE MEDICAL CARE OF INMATES
16. DEFENDANT, RICHARD HUTCHINSON, AT ALL TIMES RELEVANT TO THIS COMPLAINT IS THE DOCTOR AT SCI-SOMERSET, DOC. HE IS LEGALLY RESPONSIBLE FOR THE MEDICAL CARE OF INMATES
17. DEFENDANT, ^PTESTA, AT ALL TIMES RELEVANT TO THIS COMPLAINT IS THE PA: PHYSICIANS ASSISTANT AT SCI-SOMERSET, DOC. HE IS LEGALLY RESPONSIBLE FOR MEDICAL CARE OF INMATES
18. DEFENDANT, ERIC TICE, AT ALL TIMES RELEVANT TO THIS COMPLAINT IS THE WARDEN AT SCI-SOMERSET, DOC. HE IS LEGALLY RESPONSIBLE FOR THE SAFETY-N-CARE OF THE INMATES; AND DAILY OPERATION
19. DEFENDANT, BRIAN P. HYDE, AT ALL TIMES RELEVANT TO THIS COMPLAINT IS B. P. HYDE; HEALTH CARE ADMINISTRATOR AT SCI-SOMERSET, DOC. HE IS LEGALLY RESPONSIBLE FOR INMATE ACCESS TO MEDICAL CARE
20. ALL OF THE DEFENDANTS RELEVANT TO THIS COMPLAINT ARE EMPLOYEES OF THE PA. DOC, AND CAN READILY BE CONTACTED AT 1600 WATERS MILL ROAD, SOMERSET, PA, 15510-0001

IV. FACTS

21. PLAINTIFF IS A DARK SKIN BLACK MALE IN A STATE OF RAPID PROGRESSIVE FAILING HEALTH, WITH DEMENTIA; THE LIKELY TARGET OF MOCKERY, AND RACIALLY MOTIVATED ATTACKS
22. DEFENDANTS, K. DELISMA, WILLIAM L. BOWERS, PHILLIP MAUST, HEIDI SROKA, ROBERT SNYDER, R. PESCHOCK, J. GIRONI, ELLIS KAUFFMAN, ROXANNE PLAYSO, LARENE DARLING, FETTERMAN, RICHARD HUTCHINSON, ^PTESTA, ERIC TICE, BRIAN P. HYDE SEE ~~23~~ 23-170

VIOLATED PLAINTIFF EIGHTH AMENDMENT, WHICH STATES: EXCESSIVE BAIL SHALL NOT BE REQUIRED, NOR EXCESSIVE FINES IMPOSED NOR CRUEL-N-UNUSUAL PUNISHMENT INFLICTED

23. PLAINTIFF HAS SEVERAL SERIOUS HEALTH PROBLEMS STILL ON GOING FOR YEARS, AND AT ALL TIMES RELEVANT TO THIS COMPLAINT WILL BE REFERRED TO AS "CHRONIC ILLMENTS", i.e. NON STOP ~~EXCRUCIATING~~ ^{EXCRUCIATING} PAIN-N-EXTREME DISCOMFORT THROUGHOUT DIGESTIVE TRACT, WHIPPLE'S DISEASE, DIFFICULTY BREATHING, SPEAKING, REMAINING UPRIGHT-N-AWAKE, NEAR BLIND IN RIGHT EYE, SHARPEN LOSS OF WEIGHT, EXTREME DRY SKIN, DEMENTIA, TESTOSTERONE DEFICIENCY, DEFORMED ANKLES-ELBOWS-N-FINGERS, DIARRHEA CAUSED BY FOOD SERVED TO THE INMATES, DRIPPING SEMEN, MEMORY LOSS, MUSCLE WEAKNESS, CONTINUOUS NOSE BLEDS-N-FATIGUE, TESTOSTERONE DEFICIENCY, URETHRA STRICTURE, WHEN HOUSED ON THE BOTTOM TIER EXPERIENCE HEART ATTACK SYMPTOMS, e.g. CHEST PAIN, NUMBNESS IN ARMS-N-LEGS; IRREVERSIBLE FOOT FUNGUS, TROUBLE CONCENTRATING, etc.

24. DEFENDANTS DECLARED PLAINTIFF NEEDED IMMEDIATE EMERGENCY CARE, THEN ACTED WITH DELIBERATE INDIFFERENCE, AT ALL TIMES RELEVANT REFERRING TO WORDS, ACTIONS-N-NON COMPLAINT: W.V.D

- ACTIONS OF DOC STAFF, ADMINISTRATION, AND MEDICAL PROFESSIONAL, CITIZEN COMPLAINT.
25. AT ALL TIMES RELEVANT TO THIS COMPLAINT DEFENDANTS DENIED PLAINTIFF MEDICAL CARE-N- ACCESS TO SPECIALIST, AND MEDICINES HAVING NOT TOUCHED PLAINTIFF PHYSICALLY, NOT EVEN A CURSORY EXAM OF BLOOD PRESSURE, HEART RATE, BREATHING PATTERNS-N-PUPIL DILATION; NO LAB TEST OF BLOOD, URINE OR STOOL SAMPLE OR PAP SMEAR
 26. AT ALL TIMES RELEVANT TO THIS COMPLAINT DEFENDANTS, K. DELISMA, ~~WILLIAM L. BOWERS~~, ~~PHILLIP MAUST~~, J. GIRONE, ELLIS KAUFFMAN, RICHARD IRWIN, ROXANNE PLAYSO, LARENE DARLING, FETTERMAN, RICHARD HUTCHINSON, TESTA, BRIAN PHYPE, ERIC TICE, RESPONDED TO PLAINTIFF PLEAS FOR IMMEDIATE MEDICARE BY THROWING PLAINTIFF OUT, GIVING PLAINTIFF THE MIDDLE FINGER, RACIST RANTS, MOCKING, PHYSICAL THREATS, etc,
 27. AT ALL TIMES RELEVANT TO THIS COMPLAINT DEFENDANTS, K. DELISMA, WILLIAM L. BOWERS, PHILLIP MAUST, HEIDI SROKA, ROBERT SNYDER, ~~PHILLIP MAUST~~, J. GIRONE, ELLIS KAUFFMAN, RICHARD IRWIN, ROXANNE PLAYSO, LARENE DARLING, FETTERMAN, RICHARD HUTCHINSON, TESTA, ERIC TICE, BRIAN P. HYDE, PROFESSED CONTINUOUSLY THAT THEIR ACTIONS WERE DONE TO PLAINTIFF TO PENALIZE PLAINTIFF FOR SUING SCI-GREENE MEDICAL PROFESSIONALS, FILING GRIEVANCES AGAINST THEM PERSONALLY, AND CONTINUOUS COMMUNICATIONS WITH AUTHORITIES, i.e. THE FEDERAL COURT, DOC CENTRAL OFFICE, PUBLIC-N-ELECTED OFFICIALS, RENOWN PUBLIC FIGURES, PRISONERS ADVOCATE GROUPS, U.S. PRESIDENT-N-FIRST LADY, DOJ, U.S. ATTORNEY GENERAL, PA. GOVERNOR, PA. STATE POLICE.
 28. OVER A TEN YEARS SPAN PLAINTIFF EXPERIENCED A SUBSTANTIAL ~~AMOUNT~~ OF WEIGHT LOSS ASSOCIATED WITH HIS ONGOING FAILING HEALTH ISSUES
 29. DEFENDANTS ACKNOWLEDGED PLAINTIFF HEALTH NEEDS WARRANTED IMMEDIATE EMERGENCY MEDICAL CARE, AND CHOSE TO IGNORE THEM, MORE THAN ONE DEFENDANT ~~TOLD~~ ~~PLAINTIFF~~ TOLD PLAINTIFF DIRECTLY THAT THEY'RE NOT GOING TO WASTE THEIR TIME ON HELPING PLAINTIFF
 30. PLAINTIFF ALREADY FRAGILE STATE OF MENTAL-N-PHYSICAL HEALTH WAS EXACERBATED BY DEFENDANTS; ERIC TICE, HEIDI SROKA, -N-B.P. HYDE LACK OF INTERVENTION, WHOM WERE MADE AWARE; VIA THEIR PERSONAL PARTICIPATION; AND CONFIDENTIAL INTERVIEWS WITH PLAINTIFF CONCERNING DENIAL OF RELIGIOUS PRACTICE, MEDICAL CARE, ACCESS TO SPECIALIST, DELIBERATE INDIFFERENCE-N-BLATANT RACIST ATTITUDES OF SCI-SOMERSET MEDICAL-N-DOC STAFF; BUT DEFENDANTS, ERIC TICE, SROKA-N-HYDE RESPONDED WITH RACIST DELIBERATE INDIFFERENCE IN THEIR REFUSAL TO INTERVENE OR PREVENT FURTHER ABUSE
 31. DEFENDANTS, ERIC TICE, HEIDI SROKA-N-B.P. HYDE, WERE COMPLICIT TO THE ABUSE, AND CONDUCTED BOTH THROUGH THEIR INACTIONS-N-ENCOURAGEMENT
 32. AT ALL TIMES RELEVANT TO THIS COMPLAINT, UNLESS STATED OTHERWISE, THE 1st, 8th, AND 14th AMENDMENT VIOLATIONS TOOK PLACE AT MEDICAL DURING SICK CALL, IN REFERENCE TO LOCATION
 33. AT ALL TIME RELEVANT TO THIS COMPLAINT DURING EACH SICK CALL PLAINTIFF WAS EXPERIENCING NON STOP EXCRUCIATING PAIN-N-EXTREME DISCOMFORT
 34. AT ALL TIMES RELEVANT TO THIS COMPLAINT SICK CALL ~~THIS~~ ALWAYS CONDUCTED DURING THE MORNING HOURS
 35. AT ALL TIMES RELEVANT TO THIS COMPLAINT DEFENDANTS DENIAL OF MEDICAL CARE- COMPLAINT: W.V.D.

RELIGIOUS PRACTICE, FREEDOM OF SPEECH, EQUAL PROTECTION, AND THE RIGHT OF LIBERAT INDIFFERENCE WERE BASED ON NON-MEDICAL AND NON-PENBIOLOGICAL REASONS

36. AT ALL TIMES RELEVANT TO THIS COMPLAINT DEFENDANTS SELECTIVE ONE OUT OF 40 SICK CALL REQUEST PLAINTIFF SUBMITTED TWO-THREE TIMES ON A WEEKLY BASIS WERE RECOGNIZED THE MEDICAL CARE WAS NOT UP TO THE OBLIGATIONS ESTABLISHED UNDER THE EIGHT AMENDMENT
37. DEFENDANTS K, DELISMA, WILLIAM L. BOWERS, HEIDI SROKA, ROBERT SNYDER, R. PESCHOCK, J. BIRONE, ELLIS KAUFFMAN, RICHARD IRWIN, ROXANNE PLAYSO, LARENE DARLING, FETTERMAN, RICHARD HUTCHINSON, TESTA, ERIC TICF, BRIAN P. HYDE VIOLATED PLAINTIFF EQUAL PROTECTION RIGHTS GUARANTEED UNDER THE FOURTEENTH AMENDMENT, WHICH STATES: ALL PERSONS BORN OR NATURALIZED IN THE UNITED STATES, AND SUBJECT TO THE JURISDICTION THEREOF ARE CITIZEN OF THE STATE WHEREIN THEY RESIDE, NO STATE SHALL MAKE OR ENFORCE ANY LAW WHICH ABRIDGES THE PRIVILEGES OR IMMUNITIES OF CITIZENS OF THE UNITED STATES; NOR SHALL ANY STATE DEPRIVE ANY PERSON OF LIFE, LIBERTY, OR PROPERTY, WITHOUT DUE PROCESS OF LAW, NOR DENY PERSON WITHIN IT JURISDICTION THE EQUAL PROTECTION OF LAW
38. DEFENDANTS, ALL STATE AGENTS, ACTED UNDER THE COLOR OF STATE LAW, DENIED PLAINTIFF THE EQUAL PROTECTION OF THE LAW GUARANTEED UNDER 1ST, 8TH, AND 14TH AMENDMENTS, AND RLUIPA RIGHTS, WHEREIN PLAINTIFF WAS DENIED THE SAME TREATMENT FOR NO RATIONAL REASON, THAT WAS PROVIDED TO ALL OTHER INMATES
39. DEFENDANTS CONSISTENTLY PROVIDED ALL OTHER INMATES ON SICK CALL, ESPECIALLY WHITE INMATES MEDICAL CARE SUCCESSFULLY PER CONSTITUTION, WHILE CONDUCTING THE SAME EVENT, FOR NO RATIONAL REASON / AND OR BASED ON NON MEDICAL REASONS, DEFENDANTS DENIED PLAINTIFF MEDICAL CARE.
40. DEFENDANTS CONSISTENTLY SINGLED PLAINTIFF OUT TO SUBJECT TO THEIR ABUSES, THESE ARE ABUSES DEFENDANTS READILY WOULD OF OR REASONABLY SHOULD HAVE FORESEEN WOULD VIOLATE PLAINTIFF CONSTITUTIONAL RIGHTS, WHITE INMATES WERE NOT SUBJECTED TO THESE ABUSES. DEFENDANTS REPEATEDLY PROFESSED THEIR ABUSES TO PLAINTIFF WERE CONCOCTED TO PENALIZE PLAINTIFF FOR HIS ON GOING LITIGATION AGAINST THEM PERSONALLY, FELLOW SCI-SOMERSET DOC STAFF -N-MEDICAL PROFESSIONALS, OR FAMILY MEMBERS, E.G. GRIEVANCED ME; SUING ME; AND MEMBERS OF SOMERSET DOC STAFF AND MEDICAL PROFESSIONALS; PENALIZE PLAINTIFF FOR GRIEVANCING THEM
41. DEFENDANTS CONSISTENTLY PROVIDED THE OTHER INMATES THEIR RELIGIOUS PRACTICE, AND THEIR 1ST, 8TH, AND 14TH AMENDMENT, AND RLUIPA RIGHTS; AND WHILE CONDUCTING THE SAME EVENT, DEFENDANTS FOR NO RATIONAL REASONS, I.E. NON MEDICAL OR PENBIOLOGICAL REASON/INTEREST; SICK CALL THE SAME; DENIED PLAINTIFF THE SAME RLUIPA, 1ST, 8TH, AND 14TH AMENDMENTS; PROVIDED TO WHITE INMATES
42. DEFENDANTS, K, DELISMA, WILLIAM L. BOWERS, PHILLIP MAUST, HEIDI SROKA, ROBERT SNYDER, R. PESCHOCK, J. BIRONE, ELLIS KAUFFMAN, RICHARD IRWIN, ROXANNE PLAYSO, LARENE DARLING, FETTERMAN, R. HUTCHINSON, TESTA, ERIC TICF, BRIAN P. HYDE VIOLATED PLAINTIFF FIRST AMENDMENT RIGHTS, WHICH STATES: CONGRESS SHALL MAKE NO LAW RESPECTING AN ESTABLISHMENT OF RELIGION, OR PROHIBITING THE FREE EXERCISE THEREOF;

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- OR ABRIDGING THE FREEDOM OF SPEECH, OR THE PRESS, OR THE RIGHT OF PEOPLE PEACEFULLY TO ASSEMBLE, AND TO PETITION THE GOVERNMENT FOR A REDRESS OF GRIEVANCES
43. PLAINTIFF FIRST AMENDMENT RIGHT, FREE SPEECH, TO PETITION THE GOVERNMENT FOR A REDRESS OF GRIEVANCES PROHIBITED BY DEFENDANTS: K. DELISMA, WILLIAM L. BOWERS, PHELLIP MAUST, HEIDI SROKA, ROBERT SNYDER, R. PESCHOCK, J. GERONE, ELLIS KAUFFMAN, RICHARD IRWIN ROXANNE PLAYSO, LARENE DARLING, FETTERMAN, RICHARD HUTCHINSON, TESTA, ERIC TICE, BRIAN P. HYDE
44. PLAINTIFF EFFORT TO PURSUE LEGAL ACTION CONCERNING THE DC-ADM 804, INMATE GRIEVANCE SYSTEM WERE STYMIED-N-SEVERELY SLOWED
45. DEFENDANTS ACTIONS WOULD LIKELY HAVE DETERRED A REASONABLE PERSON FROM PURSUING THEIR RIGHTS UNDER THESE CONDITIONS
46. DEFENDANTS, ALL STATE ACTORS SUBJECTED PLAINTIFF TO ADVERSE ACTIONS
47. THE CONDUCT WHICH CAUSED DEFENDANTS ADVERSE ACTIONS AGAINST PLAINTIFF WERE PLAINTIFF ATTEMPT TO AWESSTHE COURT TO ADJUDICATE ON GOING CIVIL RIGHTS CONCERNS PROTECTED UNDER FIRST, EIGHT, EIGHT, AND FOURTEENTH AMENDMENTS-N-RLUIPA RIGHTS
48. PLAINTIFF CONDUCT OF PURSUING HIS RLUIPA-N- CONSTITUTIONAL RIGHTS WAS REASONABLE
49. DEFENDANTS ACTIONS WERE DIRECTLY IN RESPONSE TO PLAINTIFF ATTEMPT TO PURSUE CONSTITUTIONAL RIGHTS
50. A CAUSAL LINK EXISTS BETWEEN PLAINTIFF PURSUIT OF HIS CONSTITUTIONAL RIGHTS AND THE ADVERSE ACTIONS TAKEN BY DEFENDANTS AS DEMONSTRATED BY THE PROXIALITY OF THE ACTION TO PLAINTIFF PURSUIT OF HIS RIGHTS AND DECLARATION MADE BY DEFENDANTS
51. DEFENDANTS ACTIONS WERE UNUSUAL-N-ANTAGONISTIC; AND HABITUAL IN RESPONSE TO PLAINTIFF LEGAL ACTION
52. DEFENDANTS CONSTANT RECITAL OF THE SAME DECLARATIONS, "OBAMA CARE", "SUING US", "WHAT DO YOU EXPECT WHEN YOU'RE ALWAYS GRIEVANCING MEDICAL STAFF", "SUED BRENE DOO-N-MEDICAL PROFESSIONS PLAINTIFF HAD SUED THEM TOO", DEMONSTRATES A MEETING OF THE MINDS
53. PLAINTIFF ABILITY TO ADVANCE HIS CONSTITUTIONAL RIGHTS WAS ENERBATED IN THE FORM OF HIS INABILITY TO ENAGE IN HIS PURSUIT OF JUSTICE FOR HIS CIVIL RIGHTS VIOLATIONS WITHOUT FEAR OF CRUEL-N-UNUSUAL PUNISHMENT
54. PLAINTIFF REPORT OF RLUIPA, 1st, 8th AND 14th AMENDMENT VIOLATIONS LED TO DEFENDANTS FURTHER ~~THE~~ ACTS OF DELIBERATE INDIFFERENCE, WORSENING OF PLAINTIFF HEALTH CAUSING A SUBSTANTIAL RISK THAT PLAINTIFF WILL BE SUBJECTED TO GREATER HARM IN THE FUTURE
55. PLAINTIFF EXISTED IN A PERPETUAL CYCLE OF DESIRING TO SEEK A REMEDY TO THE VIOLATIONS OF HIS RIGHTS, AS WELL AS A REMEDY TO OBTAIN IMMEDIATE MEDICAL AND PHYSICAL NEEDS, DEFENDANTS, THUS FAR ~~DEFENDANTS~~ HAVE RESPONDED WITH DELIBERATE INDIFFERENCE.
56. DEFENDANTS OPENLY PROFESSED REGULARLY THAT PLAINTIFF WAS CONTINUOUSLY GRIEVANCING THEM PERSONALLY-N-OTHER SOMERSSET MEDICAL PROFESSIONALS, AND GRIEVANCE AGAINST SOMERSSET DOO STAFF-N-MEDICAL PROFESSIONALS, OR THEIR FAMILY MEMBERS; AND PLAINTIFF CONTINUOUS COMMUNICATIONS WITH AUTHORITIES IS THE REASON WHY THEY DO NOT RESPOND TO SOME OF PLAINTIFF REQUEST TO STAFF, GRIEVANCES, AND PRACTICALLY ALL OF PLAINTIFF SICK CALL REQUEST

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57. DEFENDANTS' KNOWLEDGE OF PLAINTIFF'S ONGOING LITIGATION, ACTING THEM PERSONALLY STILL IN THE GRIEVANCE STAGE, OR FELLOW SCI-GREENE DOC STAFF-N-MEDICAL PROFESSIONALS OR FAMILY MEMBERS WAS COMMON ENOUGH SO DEFENDANTS OFTEN QUOTED ACCORDING TO THE LEAD DEFENDANT'S NAME, AND CORRECT DOCKET NUMBER, OR GRIEVANCE TRACKING NUMBER, e.g., WASHINGTON V. BARNHART, 3:17-cv-0070; WASHINGTON V. SILMORE, 2:15-cv-1031; WASHINGTON V. FOLINO, NO. 644 ADA014; SRN^{IF} 817917; 733398; 807334; 804964; 801220; 782252; 770810; 691018; 690223; ~~688~~ 687454; 703977; 721569; 700732; 687451; 681830; 672452; 625794; 623974
58. DEFENDANTS, (THE WARDEN, ERIC TICE ON FIRST STAGE) GREETED PLAINTIFF AS THE PAPER PUSHER.
59. DEFENDANTS WORDS TO PLAINTIFF WHILE IN THE MIDS OF VIOLATING PLAINTIFF RLUIPA, 1ST, 8TH, AND 14TH AMENDMENT RIGHTS; THEIR ACTIONS WERE IN RESPONSE TO PLAINTIFF GRIEVANCES, COMMUNICATIONS WITH AUTHORITIES; GRIEVANCING US; YOU ARE ALWAYS GRIEVING MEDICAL STAFF, SO WHAT DO YOU EXPECT; ATTACKED MEDICAL FAMILY; WHEN PLAINTIFF SUED SCI-GREENE DOC-N-MEDICAL PROFESSIONALS, PLAINTIFF HAD SUED THEM, TOO; "YOU'RE SUING MY FAMILY MEMBER; THEY ARE ONLY PROTECTING FAMILY"
60. DEFENDANTS PROFESS, EACH ONE, REPEATEDLY-N-OPENLY THAT PLAINTIFF CONTINUOUS COMMUNICATIONS WITH AUTHORITIES, HAVING PETITIONED THE GOVERNMENT FOR REDRESS OF GRIEVANCES, SUBMITTING GRIEVANCES, PURSUIT OF JUSTICE FOR DEFENDANTS VIOLATIONS OF PLAINTIFF CIVIL RIGHTS; WAS THE MOTIVE FOR THEIR ADVERSE ACTIONS
61. DEFENDANT, K. DELISMA, J. BIRONE, ELLIS KAUFFMAN, RICHARD IRWIN, ROXANNE PLAYSO, LARENE DARLING, FETTERMAN, RICHARD HUTCHENSON, TESTA, RESPONDED TO PLAINTIFF PAIN AND DISCOMFORT, WITH SUCH STATEMENTS, "BLACKS HAVE OBAMA CARE", THIS OCCURRED DURING SICK CALL
62. DEFENDANTS, K. DELISMA, TESTA, LARENE DARLING, FETTERMAN, REPEATING THE SAME WORDS I'D HEARD FROM OTHER STAFF MEMBERS PRIOR TO MY HAVING MEET DEFENDANTS, DELISMA, TESTA, DARLING, AND FETTERMAN, WHOM INDIVIDUALLY ON SEPARATE SICK CALL SIT, WITH ANGER IN THEIR VOICE, DECLARED, "YOU ARE SUING DR. JIN, YOU'LL REGRET HAVING DONE SO, YOU WILL NOT GET PROPER MEDICAL CARE AS LONG AS YOU'RE PRISON; GO GET YOUR OBAMA CARE"
63. WHILE AWAY AT COURT ON TWO ~~SEPARATE~~ SICK CALL VISITS BY TWO SEPARATE DIAGNOSES BY DR. LAWARNCE LYONS, ON OR NEAR 10.31.16; AND DR. SANTOS, ON OR NEAR 11.7.16; THAT PLAINTIFF HAS WHIPPLE'S DISEASE. ^{BOTH} DOCTORS CONDUCTED PHYSICAL EXAMINATIONS, TOOK IN CONSIDERATION PLAINTIFF FAMILY HISTORY, AND PLAINTIFF CURRENT ON GOING SYMPTOMS. DEFENDANTS, K. DELISMA, J. BIRONE, E. KAUFFMAN, R. PLAYSO, L. DARLING, FETTERMAN, R. HUTCHENSON-N-TESTA NEVER EXAMINED ME OR CONSIDERED MY SYMPTOMS-N-FAMILY HISTORY
64. DR. LYONS PRESCRIBED MEDICINE IN ACCORDING TO "THE PIERCEK MANUAL"; FOR CURRENT-FOR PAIN, AND LONG TERM CARE BY SPECIALIST CONCERNING PLAINTIFF WHIPPLE'S DISEASE; DR. SANTOS SIGNED ON FOR THE SAME PLAN. TO DATE! DEFENDANTS, K. DELISMA, J. BIRONE, E. KAUFFMAN, R. PLAYSO, L. DARLING, FETTERMAN, R. HUTCHENSON, TESTA; CHOSE TO DISREGARD THE RECOMMENDATIONS OF THEIR OWN PERSONAL MEDICAL MANUAL, OR REFER PLAINTIFF TO SPECIALIST, AS A MEANS TO PENALIZE PLAINTIFF FOR FILING LAWSUITS-N-COMPLAINTS W V. D

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GRIEVANCES, CONTINUOUSLY COMMUNICATING WITH AUTHORITARY PERSONNEL, SAYING TO PLAINTIFF YOU HAVE OBAMA CARE

65. ON THE SECOND DAY OF TAKING THE MEDICINES PRESCRIBED BY DOCTORS LAWREN LYONS-SANTOS I RECOGNIZE A DIFFERENCE, I.E. FAR LESS PAIN IN DIGESTIVE TRACT, SO I - SOMERSET, DISCONTINUED-N-CANCELLED THE PRESCRIBED CARE OF DRS. LYONS-N-SANTOS, SAYING PLAINTIFF IS NOT WHITE, HE HAS OBAMA CARE", THE PAIN RETURNED TO ITS INTENSITY, AND CONTINUE TO GET WORST

66. DEFENDANT, B.P. HYDE REGULARLY DISCARDED PLAINTIFF TIMELY SUBMITTED SICK CALL REQUEST SUBMITTED 2-3 TIMES ON A WEEKLY BASIS, TO DATE! DEFENDANT, HYDE ACTION IS CAUSING PLAINTIFF TO LIVE IN A STATE OF NON STOP PAIN-N-DISCOMFORT

67. DEFENDANTS DENIAL OF DIET SUPPLEMENT, AND PLAINTIFF INABILITY TO PROPERLY DIGEST FOODS CONTRIBUTED TO PLAINTIFF STATE OF RAPID-N-PROGRESSIVE FAILING HEALTH.

68. WEARING DARK GLASSES PLAINTIFF RIGHT EYE OZZING PUS-N-BLOOD; AND CHRONIC AILMENTS, BEGGING FOR PAIN MEDICINE DEFENDANTS LAUGHED UNCONTROLLABLY, TOLD PLAINTIFF, HE ALREADY RECEIVES OBAMA CARE

69. MORE THAN FOUR OCCASIONS PLAINTIFF WEIGHED LESS THAN 175 LBS, YET DEFENDANTS DECLARED IT TO BE MORE THAN 190 LBS

70. DEFENDANTS DECLARED PLAINTIFF HEALTH PROBLEMS CALLED FOR CARE BY SOMEONE WITH SPECIAL SKILLS TO TREAT, BUT DENIED PLAINTIFF ACCESS TO SPECIALISTS, SAYING "BLACK HAVE OBAMA CARE"

71. WHITE INMATES ARE AFFORDED DIET-N-CARE BY SPECIALIST UPON REQUEST; PLAINTIFF, A DARK SKIN BLACK MALE WAS DENIED THE SAME CARE FOR NO RATIONAL REASONS, I.E. NON MEDICAL REASONS

72. MORE THAN ONCE DEFENDANT, R. IRWIN RECOMMENDED PLAINTIFF FOR LASER ~~STES~~ SURGERY ON PLAINTIFF RIGHT EYE. DEFENDANT, B.P. HYDE DIDNT MAKE NECESSARY ARRANGEMENTS FOR LASER SURGERY TO BE DONE; OR CANCELLED IT

73. PLAINTIFF, A DARK SKIN BLACK MALE IS IN A STATE OF RAPID PROGRESSIVE FAILING HEALTH TO DATE!

74. PLAINTIFF SUBMITTED TIMELY GRIEVANCES, SOME MORE THAN THREE TIMES CONCERNING THE CONDUCT OF DEFENDANTS, BOTH MEDICAL-N-DOC STAFF, THAT CONSTITUTE DELIBERATE INDIFFERENCE, FREE SPEECH, EQUAL PROTECTION-N-CRUEL-N-UNUSUAL PUNISHMENT, RLUIPA, VIOLATIONS UNDER 1st, 8th AND 14th AMENDMENTS, NO RESPONSE

75. THIS IS NOT A DISPUTE BETWEEN PLAINTIFF-N-MEDICAL PROFESSIONALS CONCERNING TREATMENT, DEFENDANTS RESPONSE TO PLAINTIFF PAIN-N-SUFFERING, TO DATE! HAS BEEN, "GO AWAY", I.E. DELIBERATE INDIFFERENT, IS WHY THIS LEGAL ACTION WAS BEGAN

76. PLAINTIFF HAD NEVER HEARD OF WHIPPLE'S DISEASE, PLAINTIFF WAS TAKEN TO GLEISINGER MEDICAL CENTER FOR THE SAKE OF TESTING FOR ACID REFLUX DISEASE, THE RESULT WAS NEGATIVE, WHEREUPON THE GASTROENTEROLOGIST GAVE PLAINTIFF A PAMPHLET CONCERNING WHIPPLE'S DISEASE, AND DECLARED, BASED ON YOUR SYMPTOMS HE IS CONVINCED

77. THAT PLAINTIFF HAS WHIPPLE'S DISEASE, PLAINTIFF ASKED FOR TESTING SO HE WOULD BE CERTAINLY. THE GASTROENTEROLOGIST, ^{SAID} THIS IS NOT MY FIRST ROODE, PLAINTIFF SYMPTOMS COMPLAINT: W V. D

(7)

76. THE CLASSIC FOR WHIPPLE'S DISEASE, A TEST WAS ^{NAT} ~~ONLY~~ ^{NECESSARY}, PLUS PLAINTIFF WAS ~~SENT~~ ^{ONLY} SENT TO HIM FOR TESTING FOR ACID REFLUX
77. ACCORDING TO THE GASTROENTEROLOGIST, PLAINTIFF WAS SENT THERE SPECIFICALLY FOR TESTING FOR ACID REFLUX, AND HE DID NOT HAVE THE AUTHORITY TO TEST PLAINTIFF FOR WHIPPLES; ~~NO~~ NEED FOR A TEST, THIS ISN'T MY FIRST ROdeo, THE GASTROENTEROLOGIST STATE AGAIN; YEARS LATER, THREE DOCTORS, LAWRENCE LYONS, SANTOS, AND
80. DON GRAHAM, HAVE CONFIRMED THAT GASTROENTEROLOGIST'S DIAGNOSIS, THAT PLAINTIFF INDEED DOES HAVE WHIPPLE'S DISEASE, VIA PHYSICAL EXAM, PLAINTIFF Ongoing SYMPTOMS, AND FAMILY HISTORY.
81. THE TESTING FOR ACID REFLUX: GERD PROVIDED TO PLAINTIFF AND THE TESTING FOR WHIPPLES ARE NOT ONE AND THE SAME
82. DEFENDANTS ARE MOTIVATED BY SAVING MONEY RATHER THAN COMMITTING TO A POSSIBLE 24 STRAIGHT MONTHS OF THREE PRESCRIBED DRUGS TO BE TAKEN DAILY, ALONG WITH A LIFE LONG DIET SUPPLEMENT, A VISIT, IF NOT SEVERAL VISIT TO A GASTROENTEROLOGIST. ADDITIONALLY, IT IS QUITE COMMON FOR WHIPPLES TO RE-SURFACE,
83. THEN HAVING TO AGAIN START THE 24 MONTHS OF PRESCRIBED MEDICINES AGAIN
84. WHIPPLES IS A SERIOUS DISEASE WHICH CAN INFECT ANY ORGAN IN THE BODY COMMONLY AFFECTS JOINTS, CENTRAL NERVOUS SYSTEM WHICH INCLUDES THE BRAIN, SPINAL CORD, AND NERVES LOCATED THROUGHOUT THE BODY; HEART, EYES-N- LUNGS, ~~LONG~~ LASTING NUTRITIONAL DEFICIENCIES, HEART VALVE DAMAGE, BRAIN DAMAGE, HEART FAILURE, AND LEFT UNTREATED WHIPPLES DISEASE GETS WORSE AND IS USUALLY LIFE THREATENING
85. TO DATE! PLAINTIFF EXHIBIT THE SYMPTOMS OF WHIPPLES, e.g. DIARRHEA, WEIGHT LOSS, DEFORMED ANKLES, FINGERS-N-ELBOWS, ABDOMINAL PAIN, FATIGUE, WEAKNESS, VISION PROBLEMS, MEMORY LOSS, MUSCLE WEAKNESS, DIFFICULTY WALKING, DEMENTIA.
86. DEFENDANT, K. DELISMA PROFESS THAT HE IS CURRENTLY PROVIDING PLAINTIFF MEDICAL CARE WHEN IN ACTUALITY PLAINTIFF IS LIVING WITH NON STOP EXCRUCIATING PAIN-N-DISCOMFORT, AND CONTINUOUS BEGGING FOR CARE
87. EACH TIME PLAINTIFF WAS SEEN BY DR. K. DELISMA, HE DECLARED PLAINTIFF NEEDED IMMEDIATE EMERGENCY CARE BY SPECIALIST, THEN SENT PLAINTIFF AWAY IN PAIN.
88. DEFENDANT, H. SROKA REFUSED TO RESPOND ON MORE THAN A FEW TIMES TO PLAINTIFF TIMELY SUBMITTED BRIEVANCES-N-REQUEST TO STAFF; SOME SUBMITTED THREE-N-FOUR TIMES
89. DURING A CONFIDENTIAL INTERVIEW WITH DEFENDANT, H. SROKA, PLAINTIFF WAS TOLD THAT PLAINTIFF HAD NO NEED TO CONTINUE FILING MORE THAN ONE BRIEVANCE CONCERNING THE SAME ISSUE; THAT IS WHY SHE HADN'T RESPONDED, IF PLAINTIFF FAILED TO MEET PARTICULAR REQUIREMENT OF THE BRIEVANCE POLICY SHE WOULD HAVE REJECTED PLAINTIFF BRIEVANCES, THE BRIEVANCE WERE ASSIGNED BRIEVANCE TRACKING
90. NUMBERS BECAUSE THE BRIEVANCE MEET ALL THE REQUIREMENTS OF THE BRIEVANCE POLICY, SO FROM NOW ON PLAINTIFF SHOULDN'T EXPECT HER TO RESPOND TO PLAINTIFF MULTI-FILED BRIEVANCE-N-REQUEST TO STAFF CONCERNING PLAINTIFF NOT RECOVER COMPLAINT: W.V.D

ING A RESPONSE TO A GRIEVANCE

92. DURING THREE SEPARATE INTERVIEWS WITH WARDENS, TREVOR WINGARD AND MELISSA HAINSWORTH, CONCERNING PLAINTIFF NOT RECEIVING A RESPONSE TO EVERY GRIEVANCE WHERE PLAINTIFF FILED REQUESTING MONETARY RELIEF, PLAINTIFF WAS TOLD IN EACH INSTANCE THAT PLAINTIFF REQUEST FOR MONETARY RELIEF WAS "DISRESPECTFUL", AND "DESTRUCTIVE", AND THE GRIEVANCE COORDINATOR WAS TOLD NOT TO RESPOND TO ALL OF PLAINTIFF GRIEVANCES THAT REQUESTED MONETARY RELIEF, ACCORDING TO WARDENS: TREVOR WINGARD-N-MELISSA HAINSWORTH, THE GRIEVANCE
92. POLICY, DC-ADM 804 A(1), (5) STIPULATES THIS, 'SO IT WILL BE TOTALLY A WASTE OF TIME FOR THE PLAINTIFF TO CONTINUE TO DO SO.
93. DUE TO THE CONFLICT WITH THE RESPONSIBILITIES OF WARDENS: TREVOR WINGARD-N-MELISSA HAINSWORTH, AND GRIEVANCE COORDINATOR, HEIDI SROKA, AND THE DICTATES OF THE DC-ADM 804, INMATE GRIEVANCE SYSTEM, PLAINTIFF FILED ADDITIONAL COPIES OF THE SAME GRIEVANCE FOR THE SAKE OF PLAINTIFF BEING IN COMPLIANCE WITH DC-ADM. 804, A(13) (1), THIS WAS PLAINTIFF WAY OF AVOIDING BOTH WARDENS: MELISSA HAINSWORTH-N-TREVOR WINGARD CLAIM THAT PLAINTIFF REQUEST FOR MONETARY RELIEF WAS DISCOURTEOUS, DC-ADM 804; SEE 88-92, 94-98, 103

V. EXHAUSTION OF LEGAL REMEDIES.

94. PLAINTIFF HAS EXHAUSTED ALL AVAILABLE REMEDIES WHEREBY NUMEROUS TIMELY SUBMITTED GRIEVANCES REQUESTING MONETARY RELIEF WAS NOT RESPONDED TO
95. PLAINTIFF RESUBMITTED SOME GRIEVANCES-N-REQUEST TO STAFF THREE-N-FOUR TIMES, AND STILL NO RESPONSE
96. DEFENDANT, H. SROKA, AND BOTH WARDENS: M. HAINSWORTH-N-T, WINGARD STATED UNAMBIGUOUSLY, NOT RESPONDING TO GRIEVANCES CONCERNING MORE THAN ONE ISSUE, OR FILED MORE THAN ONCE, AND/OR REQUESTING MONETARY RELIEF
97. PLAINTIFF EXHAUSTED ALL AVAILABLE REMEDIES CONCERNING ALL RELEVANT ISSUES TO THIS LEGAL ACTION, AND THUS THROUGH THE COURT IS PLAINTIFF ONLY AVENUE TO ADEQUATE REMEDY.
98. BOTH WARDENS: M. HAINSWORTH-N-T, WINGARD DECLARED PLAINTIFF TIMELY SUBMITTED GRIEVANCES THAT REQUESTED MONETARY RELIEF WERE "DISCOURTEOUS", "DISRESPECTFUL"-N-"DESTRUCTIVE", SO THEY TOLD THE GRIEVANCE COORDINATOR NOT TO RESPOND TO ALL OF PLAINTIFF GRIEVANCES REQUESTING MONETARY RELIEF SEE 90-97, 103

VI. LEGAL CLAIMS.

COUNT ONE - DELIBERATE INDIFFERENCE, AND CRUEL-N-UNUSUAL PUNISHMENT

99. PLAINTIFF ALLEGES AND INCORPORATES BY REFERENCE PARAGRAPHS 1-98
100. ON OR NEAR 7.16.15 CONTINUED UNTIL HER REASSIGNMENT, DEFENDANT, H. SROKA, GRIEVANCE COORDINATOR, FAILED TO RESPOND TO ALL GRIEVANCES WHERE PLAINTIFF REQUEST MONETARY RELIEF, SOME SUBMITTED THREE-N-FOUR TIMES, PLAINTIFF WAS TOLD BY DEFENDANT, SROKA, THAT SHE TAKES EXCEPTION TO PLAINTIFF FILING MORE THAN ONE COMPLAINT. W.V.D

- GRIEVANCE CONCERNING THE SAME ISSUE, THAT'S WHY SHE DID NOT RESPOND TO THOSE GRIEVANCES. DURING A INTERVIEW, THIS NON RESPONSE DID NOT END SEE: 21
101. SAME INTERVIEW, DEFENDANT, HEIDI SROKA, SPOKE IN A SCOLDING TONE SHE DECLARED, THERE WERE ABSOLUTELY NO FAULTS OR SHORT COMINGS IN THE GRIEVANCES WHICH SHE ASSIGNED GRIEVANCE TRACKING NUMBER; AND IN THE FUTURE SHE WOULD NOT RESPOND TO ALL GRIEVANCES WHICH PLAINTIFF RESUBMITTED, NOR REQUEST TO STAFF INQUIRING ABOUT GRIEVES NOT RESPONDED TO SEE 88-92, 94-98, 21, 27, 40
102. SAME INTERVIEW, DURING THREE SEPARATE INTERVIEWS WITH EACH WARDEN: TREVOR WINBARD-N-MELISSA HAINSWORTH, PLAINTIFF ASKED WHY EVERY GRIEVANCE PLAINTIFF SUBMITTED REQUESTING MONETARY RELIEF, WARDENS: WINBARD-N-HAINSWORTH, SCOLD PLAINTIFF AND ACCUSED PLAINTIFF OF BEING "DISCOURTEOUS", "DISRESPECTFUL", "DSTRUCTIVE", AND THEY TOLD ~~PLAINTIFF~~ THE GRIEVANCE COORDINATOR PERSONALLY NOT TO RESPOND TO ALL PLAINTIFF GRIEVANCES WHERE PLAINTIFF REQUESTED MONETARY RELIEF. THE BASIS FOR NOT RESPONDING TO PLAINTIFF "DISRESPECTFUL", "DSTRUCTIVE", "DISCOURTEOUS" GRIEVANCES WAS IN ACCORDANCE TO DE-ADM POLICY 844, GRIEVANCE POLICY, WARDENS, WINBARD-N-HAINSWORTH DECLARED TO PLAINTIFF THAT FILING GRIEVANCES REQUESTING MONETARY RELIEF WOULD BE A WASTE OF TIME, SEE 92, 88-98, 21
104. DURING THE INTERVIEW WITH DEFENDANT, H. SROKA, DEFENDANT, SROKA WAS SHOWN PLAINTIFF FEET WITH TOENAILS ALL DISCOLORED, BLOOD STAINED SOCKS, TOENAILS DISCHARGING PUS-N-BLOOD, LEGS COVERED IN FLAKY SKIN DUE TO ATHLETE'S FOOT FUNGUS, DEFORMED FINGERS, ELBOWS-N-ANKLES, HAVING TO REPEAT HIS WORDS TWO-THREE TIMES DUE TO PLAINTIFF DIFFICULTY SPEAKING, THEN-N-AFTER DEFENDANT, SROKA WAS DELIBERATE INDIFFERENT TO PLAINTIFF SERIOUS HEALTH PROBLEM, REFUSED TO RESPOND TO PLAINTIFF NUMEROUS TIMESLY SUBMITTED GRIEVANCES-N-DE-135A'S REQUEST TO STAFF.
105. SAME EVENT, DEFENDANT, H. SROKA REFUSAL TO RESPOND TO PLAINTIFF GRIEVANCES REQUESTING MONETARY RELIEF CONCERNING 1st, 8th, AND 14th AMENDMENT, AND RLUTPA RIGHTS ABUSERS MADE DEFENDANT, SROKA ACUTELY AWARE OF ON GOING ABUSES, DEFENDANT, SROKA'S FAILURE TO CORRECT IT VIOLATE PLAINTIFF RIGHTS-N-CONSTITUTED CRUEL-N-UNUSUAL PUNISHMENT, PER EIGHTH AMENDMENT,
106. ON OR NEAR 10.6.17, DEFENDANT, W. L. BOWERS, A BLOCK UNIT MANAGER; AB POD HOUSING; WAS DELIBERATE INDIFFERENCE TO PLAINTIFF CONTINUOUS EXPERIENCE OF DREAMS-N-VISIONS OF PAST STAFF-N-MEDICAL PROFESSIONALS SEXUAL-N-PHYSICAL ASSAULTS, FURTHER ADVANCING PLAINTIFF DEMENTIA, OFTEN LOSING TOUCH WITH REALITY 20-60 MINUTS ON A DAILY BASIS SEE: 107, 108-112, 121, 27, 21, 348, 365, 375
107. SAME EVENT, 10.6.17, DEFENDANT, BOWERS HAVING FOREKNOWLEDGE THAT PLAINTIFF WAS MOVED OUT OF THE EXACT LOCATION WHICH CAUSED PLAINTIFF PSYCHOLOGICAL PROBLEMS, PLAINTIFF PERSONALLY, PLAINTIFF COUNSELOR-PSYCHOLOGISTS-PSYCHIATRIST-N-AA POD OFFICER REMINDED DEFENDANT, BOWERS SEVERAL TIMES OVERAN-CONTINUED TO DO SO UNTIL PLAINTIFF WAS MOVED FEBRUARY OF 2019, SOME 18-MONTHS LATER SEE 27, 40-43, 21, 348, 365
108. SAME EVENT, 10.6.17 DEFENDANT, BOWERS BEING MADE AWARE SEVERAL TIMES COMPLAINT: W. V. D

- WEEKLY, CONTINUING UNTIL FEBRUARY 2019, THAT PLAINTIFF'S MENTAL BASIS IS STILL BEING AFFECTED PSYCHOLOGICALLY ON GOING TO DATE! . . . DUE TO LOCATION OF THE CELL PLAINTIFF UNDERWENT PSYCHOLOGICAL EXPERIENCE, WITH NUMEROUS OPPORTUNITIES OR AVAILABLE CELLS TO RELOCATE PLAINTIFF DEFENDANT, BOWERS, VOWED TO KEEP PLAINTIFF IN THIS LOCATION, A CELL WHICH DEFENDANT, BOWERS DEMAND THAT PLAINTIFF REMAIN IN THIS LOCATION, PLAINTIFF MENTAL HEALTH IS SECONDARY. . . DEFENDANT, BOWERS DUBBED THE CELL "FOR BLACKS ONLY!". PRIOR TO FEBRUARY 2019, NO WHITES WERE ASSIGNED TO THIS CELL, DUE TO PLAINTIFF BEING A DARK SKIN BLACK MALE DEFENDANT, BOWERS DISREGARDED PLAINTIFF MENTAL HEALTH.
109. SAME EVENT, 10.6.17, DEFENDANT BOWERS TO DATE! CONTINUOUSLY MOVE YOUNG-N-HEALTHY INMATES, ESPECIALLY "WHITE INMATES", UPON REQUEST INTO THE LOCATION ALL PSYCHOLOGISTS ARE REQUESTING TO DATE! THAT PLAINTIFF NEEDED TO BE MOVED INTO, DEFENDANT, BOWERS ACTIONS VIOLATED PLAINTIFF RIGHTS-N-CONSTITUTE CRUEL-N-UNUSUAL PUNISHMENT PER 8TH AMENDMENT SEE 27, 40, 106-108, 110-112, 121, 225, 177-180, 175, 21
110. ON OR NEAR 1.9.18, HOUSING, DEFENDANT, W, L, BOWERS, A BLACK UNIT MANAGER DELIBERATE INDIFFERENCE TO NUMEROUS APPEALS OF PSYCHIATRISTS, PSYCHOLOGIST-N-COUNSELOR TO MOVE PLAINTIFF OUT OF THE CELL PLAINTIFF WAS BEING FORCED TO HOUSE CURRENTLY CAUSING PLAINTIFF TO EXPERIENCE VISIONS-N-DREAMS OF BEING SEXUALLY-N-PHYSICALLY ASSAULTED, AND TO LOSE TOUCH WITH REALITY OFTEN FOR AN HOUR SEE: 178-180, 21, 365, 40
111. SAME EVENT, 1.9.18, DEFENDANT, BOWERS RESPONDED TO PLAINTIFF PRIVATELY, DECLARED, "PLAINTIFF SHOULD ACCEPT THE REALITY THAT PLAINTIFF WAS NOT WHITE, PLAINT WOULD NOT BE GRANTED THE RIGHTS-N-PRIVILEGES WHITE INMATES RECEIVE"
112. SAME EVENT, 1.9.18, DEFENDANT, BOWERS DEMAND THAT THE PLAINTIFF HOUSE IN THE CELL CURRENTLY CAUSING PLAINTIFF CONTINUOUS PSYCHOLOGICAL PROBLEMS ON A DAILY BASIS CONTRIBUTING TO PLAINTIFF DEMENTIA GETTING WORST. ACCORDING TO DEFENDANT, BOWERS, "THE COST OF BEING BLACK IS YOU DO AS WHITES SAY". . . DEFENDANT, BOWERS ACTIONS VIOLATED PLAINTIFF RIGHTS-N-CONSTITUTED CRUEL-N-UNUSUAL PUNISHMENT PER EIGHTH AMENDMENT SEE 27, 40, 37, 42, 106-111, 121, 244, 271, 225, 219, 177, 174, 21, 175, 178-180, 243, 244, 271, 348, 356, 364, 375, 376, 342, 363
113. ON OR NEAR 1.15.18, SICK CALL, DEFENDANT, S, GIRONI, DOCTOR, DELIBERATE INDIFFERENCE TO PLAINTIFF EXPERIENCING NON STOP PAIN-N-DISCOMFORT, IN DARK SUNGLASSES AS PLUS DISCHARGE FROM RIGHT EYE, SWOLLEN ANKLES, DEFORMED FINGERS-N-ELBOWS, URETHRA STRICTURE, STRUGGLING TO SPEAK, SKIN DRY-N-CRACKED-N-BLEEDING, STRUGGLING TO STAND SEE: 22-26, 28-33, 35, 61-65, 3940, 61, 68-74, 84, 192, 193, 21, 244, 260, 274, 330-332, 340, 341, 376, 372, 363, 376
114. SAME EVENT, 1.15.18, DEFENDANT, GIRONI, RESPONDED TO PLAINTIFF, SO YOU LIKE SUING MEDICAL STAFF, "YOUR HEALTH IS DEPLORABLE, YOU BLACK MEN COME TO PRISON AND WANT ALL OF YOUR MEDICAL NEEDS MEET" "WHERE WHITES WHO WORKED HARD ALL OF THEIR LIVES AND CAN'T AFFORD CARE" DEFENDANT, GIRONI SENT PLAINTIFF TO ANOTHER ROOM, NEVER TOUCHED PLAINTIFF PHYSICALLY SEE: 61, 25, 21
115. SAME EVENT, 1.15.18, DEFENDANT, GIRONI LAUGHED EACH TIME PLAINTIFF REQUESTED MEDICINE FOR PAIN, SAYING "SUE ME", PLAINTIFF WAS TURNED AWAY COMPLAINT: W. N. D.

- WEAK-N-IN NON STOP PAIN-N-DISCOMFORT, STRUGGLE TO BREATHE, NEAR BLIND IN RIGHT EYE, DEFENDANT, GIRONI ACTIONS VIOLATED PLAINTIFF RIGHTS-N-CONSTITUTED CRUEL-N-USUAL PUNISHMENT PER EIGHTH AMENDMENTS SEE 24-26, 35-37, 39-41, 61, 63, 68, 71, 73, 74, 2116. ON OR NEAR 3.13.18, SICK CALL, E. KAUFFMAN, DOCTOR, DELIBERATE INDIFFERENCE TO PLAINTIFF EXPERIENCING NON STOP PAIN-N-DISCOMFORT TO SUCH A DEGREE PLAINTIFF WAS ADDED INTO DEFENDANT, KAUFFMAN OFFICE BY FELLOW INMATES, DISCHARGE OF PURS-N-BLOOD FROM RIGHT EYE-N-FEET, NEAR ZERO EYESIGHT IN RIGHT EYE, NON STOP PAIN-N-DISCOMFORT OF INTESTINAL TRACT, UNABLE TO RAISE VOICE ABOVE A WHISPER, URETHRAL STRICTURE. SEE 21-33, 35-37, 39-41, 68, 71, 73-75, 52, 35, 61-65, 68, 69, 123, 342, 363
117. SAME EVENT, 3.13.18, DEFENDANT, KAUFFMAN STATE, "YOU HAVE A REPUTATION OF SUING MEDICAL STAFF, WELL YOU CAN SUE ME TOO, I AM GOING TO ^{SEE TO} IT THAT AS LONG AS YOU'RE IN PRISON YOUR MEDICAL NEEDS WILL NEVER BE MET. YOU BLACK MEN ARE ALL A MES; YOU ROB-STEAL-SELL DRUGS-TRAVEL IN PACKS LIKE WOLVES; SHOOT-N-KILL YOUR OWN; YOU ARE A BUNCH OF ANIMALS, YOU CAME TO PRISON GET FREE MEDICAL CARE AND "WE" WHITES ARE FORCED TO FOOT THE BILL" SEE 133, 61, 70, 194, 195, 123, 133, 148, 27, 43-51, 56-60, 132
118. SAME EVENT, 3.13.18, DEFENDANT, KAUFFMAN, MORE THAN ONCE PLAINTIFF REQUESTED MEDICINE FOR PAIN. DEFENDANT, KAUFFMAN LAUGHED, RESPONDED, "YOU NEED TO FEEL PAIN, JUST LIKE THE MEDICAL PROFESSIONALS YOU SUED", THEN TOLD PLAINTIFF TO LEAVE, HAVING NEVER TOUCHED PLAINTIFF PHYSICALLY, DEFENDANT, KAUFFMAN ACTION VIOLATED PLAINTIFF RIGHTS-N-CONSTITUTED CRUEL-N-USUAL PUNISHMENT PER EIGHTH AMENDMENT SEE 25, 37-41, 52, 128, 132, 133, 148, 149, 261, 275, 21
119. ON OR NEAR 4.3.18, SICK CALL, DEFENDANT, E. KAUFFMAN, DOCTOR, DELIBERATE INDIFFERENCE TO PLAINTIFF NON STOP PAIN-N-DISCOMFORT, FEET IN BLOOD, NEAR ZERO SIGHT IN RIGHT EYE, UNABLE TO STAND UPRIGHT, UNABLE RAISE VOICE ABOVE A WHISPER, URETHRAL STRICTURE, PLAINTIFF REPEATEDLY REQUESTED MEDICINE FOR PAIN, DEFENDANT, KAUFFMAN LAUGHED EACH TIME SEE 123, 68
120. SAME EVENT, 4.3.18, DEFENDANT, KAUFFMAN SCOLD PLAINTIFF, SAYING "HE WAS MAKING AMERICA GREAT AGAIN BY GETTING RID OF FREELOADERS SUCH AS PLAINTIFF", "PLAINTIFF WAS NOT DESERVING OF MEDICAL CARE, HE WAS HAPPY TO SEE PLAINTIFF IN SUCH PAIN", WITHOUT TOUCHING PLAINTIFF PHYSICALLY DEFENDANT, KAUFFMAN TOLD PLAINTIFF TO "GET THE FUCK OUT, NEVER COME BACK", N.B. TO DATE! PLAINTIFF HAS SUBMITTED TWO-THREE SICK CALL REQUEST ON A WEEKLY BASIS SINCE 7.2.18, PLAINTIFF HAS NOT BEEN AFFORDED CARE. (TO DATE! SEPTEMBER 2019, THE SAME HAS OCCURRED). PLAINTIFF TO DATE! IS "SICK-N-IN NON STOP PAIN" AND DISCOMFORT ON A DAILY BASIS. DEFENDANT, KAUFFMAN ACTIONS VIOLATED PLAINTIFF RIGHTS-N-CONSTITUTED CRUEL-N-USUAL PUNISHMENT PER EIGHTH AMENDMENT SEE 21-26, 36, 39, 350, 352-354, 66, 35-37, 39-41, 61, 68, 68-74, 82, 27
121. ON OR NEAR 4.9.18, HOUSING, DEFENDANT, W. L. BOWERS, A BLOCK UNIT MANAGER, DELIBERATE INDIFFERENCE TO PSYCHIATRIST FOR THE UMPTIENETH TIME WAS TOLD DEFENDANT, BOWERS, THAT THE CELL PLAINTIFF WAS BEING HOUSED, DUE TO ITS LOCATION WAS CAUSING ~~BY~~ PLAINTIFF PSYCHOLOGICAL PROBLEMS TO GET WORST, DEFENDANT, BOWERS, DEMANDED COMPLAINT: W V. D

- THAT PLAINTIFF FIND A FELLOW INMATE WILLING TO SIGN A DOCUMENT STATING THEIR WILL-
 NESS TO MOVE INTO THE CELL THE PSYCHIATRIST DIAGNOSED IS CAUSING PLAINTIFF PSYCHO-
 LOGICAL GET WORST, THE FELLOW INMATE HAD TO BE A BLACK INMATE, NO WHITE INMATE IS
 EVER GIVEN SUCH PREREQUISITES, DEFENDANT, BOWERS ACTIONS VIOLATED PLAINTIFF RI-
 GHTS-N-CONSTITUTES CRUEL-N-UNUSUAL PUNISHMENT PER EIGHTH AMENDMENT SEE 108
 122. ON OR NEAR 7.2.18, SICK CALL, DEFENDANT, L. DARLING, CNP, RESPONDED WITH DE-
 LIBERATE INDIFFERENCE TO PLAINTIFF INABILITY TO GET UPRIGHT DUE TO NON STOP PAIN-N-
 DISCOMFORT THROUGHOUT INTESTINAL TRACT-N-STRUGGLE TO SPEAK, DEFENDANT, DARLING DE-
 NIED PLAINTIFF THREE REQUEST FOR PAIN MEDICINE, AND TOLD PLAINTIFF HE HAD OBAMA
 CARE, AND NEVER TOUCHING PLAINTIFF PHYSICALLY FOR CURSORY EXAM, DEFENDANT, DAR-
 LING WENT NEXT DOOR TO CONFER WITH ANOTHER MEDICAL PROFESSIONAL, RETURNED, TOLD
 PLAINTIFF IN A REAL DISMISSIVE TONE, 'LEAVE RIGHT AWAY', DEFENDANT, DARLING
 ACTIONS VIOLATED PLAINTIFF RIGHTS, AND CONSTITUTE CRUEL-N-UNUSUAL PUNISHMENT
 PER EIGHTH AMENDMENT SEE 52, 54, 61, 39, 40, 200, 264, 278, 22-26, 21, 70, 123, 133, 128, 132, 148, 149
 39,
 123. ON OR NEAR 11.6.18, SICK CALL, DEFENDANT, E. KAUFFMAN, PAC, DELIBERATE IN-
 DIFFERENCE TO PLAINTIFF LACK OF EYESIGHT IN RIGHT EYE CURRENTLY DISCHARGING
 PUS-N-BLOOD, FEET WITH DISCOLORED TOENAILS DOZING PUS-N-BLOOD, AND NON STOP
 PAIN-N-DISCOMFORT THROUGHOUT INTESTINAL TRACT, PLAINTIFF, BARELY AUDIBLE,
 REPEATING HIMSELF TWO-THREE TIMES PLAINTIFF BEGGED FOR MEDICINE FOR PAEN, DE-
 FENDANT, KAUFFMAN, RESPONDED, 'YOU'RE IN PAIN, IT COULDN'T HAPPEN TO A BETTER PER-
 SON, "BLACK MEN". SENT PLAINTIFF AWAY IN NON STOP PAIN-N-DISCOMFORT, DEFEND-
 ANT, KAUFFMAN ACTIONS VIOLATED PLAINTIFF RIGHTS-N-CONSTITUTED CRUEL-N-UNUSUAL
 PUNISHMENT PER EIGHTH AMENDMENT SEE 22-26, 39, 40, 61, 62, 68, 70, 194, 195, 122, 133, 136
 124. ON OR NEAR 11.7.18, CONFIDENTIAL INTERVIEW, DEFENDANT, E. TICE, WARDEN, DE-
 LIBERATE INDIFFERENCE TO FEET IN BLOOD, DISCOLORED TOENAILS; STRUGGLE TO SPEAK; HAV-
 ING SUBMITTED SICK REQUEST; EXPERIENCING NON STOP PAIN-N-DISCOMFORT IN INTEST-
 IAL TRACT, THIS WAS ONE OF THREE OR FOUR INTERVIEWS SHARED WITH DEFENDANT,
 TICE, AND EACH TIME DEFENDANT, TICE RESPONDED IN A TONE OF REBUKE IN
 RACIST OVERTONE SEE 137, 138, 21, 22-31, 40, 52, 56-60, 82, 115-127, 137, 138, 214-224, 236, 237,
 240, 243, 244, 232, 246, 249, 268, 287-289, 340, 241, 376, 341, 342, 343, 376
 125. SAME EVENT, DEFENDANT, TICE; AT THE SIGHT OF PLAINTIFF FEET, SAID, 'WOW',
 YOU HAVE A SERIOUS PROBLEM, YOU NEED THE DOCTOR TO CARE FOR THAT OR YOU'LL GET GAN-
 GRENE, AND YOU WON'T HAVE FEET AT ALL, WHEN PLAINTIFF EXPLAINED, IN DETAIL
 CONCERNING HAVING SUBMITTED TWO-THREE SICK CALL REQUEST WEEKLY, RARELY RE-
 COGNIZED, AND EVEN THEN THE MEDICAL PROFESSIONALS DO NOT PROVIDE CARE, N.B.
 MANY OTHER ISSUES WERE DISCUSSED, DEFENDANT, TICE; APPEARED SHOCKED AT THE
 SIGHT OF THE DISCHARGE OF PUS IN THE CORNER OF PLAINTIFF RIGHT EYE, STATED, IF YOU
 DON'T GET THAT LOOKED IMMEDIATELY YOU'LL BE BLIND IN ONE, AND MISSING BOTH FEET
 126. SAME EVENT, DEFENDANT, TICE; WHEN PLAINTIFF REQUESTED THAT HE INTER-
 VENE AND PROCURE MEDICAL CARE (AS WELL AS RELIGIOUS PRACTICE, APPROPRIATE HOUS-
 ING, EQUAL PROTECTION OF EMPLOYMENT OPPORTUNITIES), DEFENDANT, TICE ANGERLY
 STATED, YOU'RE SO QUICK TO SUE EVERYBODY, ITS YOUR OWN DAMN FAULT THAT YOU
 COMPLAINT: W.V.D

- CANT GET PEOPLE TO GET A PLAN FOR YOU, DEFENDANT, TICE, DECLARED, I DONT CARE IF YOU DIED AT THIS INSTANCE, I WOULDNT LIFT A FINGER TO HELP YOU. SEE: 31
127. SAME EVENT, ON OR NEAR 11.7.18; 12.19.18, JANUARY 2019, AND MORE THAN TWO ADDITIONAL OCCASIONS, DEFENDANT, TICE PERSONALLY OBSERVED PLAINTIFF WAS BEING DENIED CARE, FAILED TO CORRECT THESE 1ST, 8TH, 14TH AMENDMENT, RLUIPA RIGHTS ABUSES, AND ITS CONTINUING; DEFENDANT, TICE IS ALSO VIOLATING PLAINTIFF RIGHTS-N-CONSTITUTED CRUEL-N-UNUSUAL PUNISHMENT PER EIGHTH AMENDMENT
128. ON OR NEAR 11.20.18; SICK CALL; DEFENDANT, E. KAUFFMAN, PACS, DELIBERATE INDIFFERENCE TO PLAINTIFF EXPERIENCING NON STOP PAIN-N-DISCOMFORT, HAVING TO PAUSE EVERY FEW MINUTES, THE SMELL OF PLAINTIFF FEET CAUSED DEFENDANT, KAUFFMAN TO SAY, WHAT IS THAT SMELL; PLAINTIFF COMPLAINED HE COULD ^{NOT} SEE AT ALL OUT OF HIS RIGHT EYE, DEFENDANT, KAUFFMAN, LAUGHED AS IF HE'D HEARD THE GREATEST JOKE EVER, WITHOUT TOUCHING PLAINTIFF PHYSICALLY, DEFENDANT, KAUFFMAN, DECLARED, ALL YOU BLACK MEN EVER DO IS COMPLAIN SENT PLAINTIFF AWAY IN NON STOP PAIN-N-DISCOMFORT. SEE: 21, 52, 116-120, 123, 129-133, 148, 149, 194, 195, 352-352, 354, 340, 24-26, 21, 35, 36, 39-41, 61, 68, 70, 71, 82, 348, 261, 275, 336-342, 363, 376
129. SAME EVENT, 11.20.18, DEFENDANT, KAUFFMAN, ACTIONS VIOLATED PLAINTIFF RIGHTS-N-CONSTITUTED CRUEL-N-UNUSUAL PUNISHMENT PER EIGHTH AMENDMENT
130. ON OR NEAR 11.27.18, SICK CALL, DEFENDANT, K. DELISMA, MEDICAL DIRECTOR DELIBERATE INDIFFERENCE TO PLAINTIFF PLEAS FOR MEDICINE FOR THE NON STOP PAIN-N-DISCOMFORT IN THE INTESTINAL TRACT TO THE DEGREE THE SLIGHTEST MOVE EXACERBATED THE PAIN, DEFENDANT, DELISMA RESPONSE, TO PLAINTIFF, YOUR REPUTATION FOR FILING BRIEVANCES-N-LAWSUIT AGAINST INDIVIDUALS UNDER HIS SUPERVISION, AND ~~WHEN~~ WHEN PLAINTIFF CHANGE HIS WAY, THEN PLAINTIFF WOULD RECEIVE PROPER CARE
131. ON OR NEAR 11.27.18; SAME EVENT, DEFENDANT, DELISMA, SAID TO PLAINTIFF SEE YOU, AS HE POINTED TO THE DOOR, LEAVING WITHOUT ANY TYPE OF PHYSICAL EXAM; STILL IN NON STOP PAIN-N-DISCOMFORT. DEFENDANT, DELISMA ACTIONS VIOLATED PLAINTIFF RIGHTS AND CONSTITUTED CRUEL-N-UNUSUAL PUNISHMENT PER EIGHTH AMENDMENT SEE: 21, 25, 26, 167, 135, 157, 146, 37
132. ON OR NEAR 12.4.18, SICK CALL, DEFENDANT, E. KAUFFMAN, PACS, ANGRY THAT PLAINTIFF CITED DEFENDANT, KAUFFMAN AS A DEFENDANT IN WASHINGTON V. BARNHART, 3:17-CV-0070; DEFENDANT, KAUFFMAN DELIBERATE INDIFFERENCE TO PLAINTIFF HAVING OPEN SORES ON BOTH FEET FORCING PLAINTIFF TO WALK WITH PAIN; PAINFUL URETHRA STRICTURE, LITTLE SIGHT IN RIGHT EYE, AND NON STOP PAIN-N-DISCOMFORT SEE 56-60
133. ON OR NEAR 12.4.18, SAME EVENT, DEFENDANT, KAUFFMAN IN RACIST RANT, YOU BLACK MEN HAVE NO CONSCIENCE, WANTING HARD WORKING TAX PAYING WHITE PEOPLE TO PAY FOR YOUR MEDICAL NEEDS, WHILE WHITES WHO PAY FOR YOUR MEDICAL CARE ARE FORCED TO FORGO THEIR OWN MEDICAL NEEDS, THEN, WITHOUT HAVING TOUCHED PLAINTIFF PHYSICALLY TO PROVIDE A CURSORY EXAM, DEFENDANT, KAUFFMAN, SHOUTED YOU ARE NOTHING MORE THAN A PARASITE, GET OUT, YOU BLACK ^{MEN} ARE ALL PARASITES. DEFENDANT, KAUFFMAN ACTION VIOLATED PLAINTIFF RIGHTS-N-CONSTITUTED CRUEL-N-UNUSUAL PUNISHMENT PER EIGHTH AMENDMENT SEE: 61, 62, 52, 21, 116-120, 123, 128, 132, 133, 148, 149, 194, 195, 261, 275, 21-24, 29-33, 35, 61-65, 70, 27, 40

COMPLAINT: W V D

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134. ON OR NEAR 12.13.18, SICK CALL, DEFENDANT, K. DELISMA, MEDICAL DIRECTOR, DELIBERATE INDIFFERENCE TO PLAINTIFF IN DARK SUN GLASSES RIGHT EYE DISCHARGING PUS, INABILITY TO SPEAK ALOUD, NON STOP PAIN-N-DISCOMFORT THROUGHOUT INTESTINAL TRACT, DEFENDANT, DELISMA, TOLD PLAINTIFF, ^{BLACKS} YOU MUST LEARN TO LIVE WITH PAIN-N-SUFFERING, OTHERWISE PLAINTIFF MAKE ~~THE~~ LOOK WEAK-N-HELPLESS, WALK TO THE DOOR WHERE A SPANISH SPEAKING INMATE WAS WAITING TO SEE ANOTHER MEDICAL PROFESSIONAL ^{SEE: 130, 131, 135, 150, 155-157, 87, 25, 36, 29, 39, 66, 82-87, 174-176, 259, 270, 21, 20, 42-60, 40}
135. ON OR NEAR 12.13.18, SAME EVENT, DEFENDANT, DELISMA TOLD THE OTHER MEDICAL PROFESSIONAL THAT HE WAS GOING TO TREAT THE SPANISH SPEAKING INMATE SO THE OTHER MEDICAL PROFESSIONAL SHOULD CALL THE NEXT INMATE. DEFENDANT, DELISMA INBAGE IN COMMUNICATION IN SPANISH WITH THE SPANISH SPEAKING INMATE, TOLD PLAINTIFF TO RETURN TO THE BLOCK, THE SPANISH SPEAKING WAS YOUNG-N-JOVIAL
136. ON OR NEAR 12.13.18, SAME EVENT, DEFENDANT, DELISMA ACTION VIOLATED PLAINTIFF RIGHTS-N-CONSTITUTED CRUEL-N-UNUSUAL PUNISHMENT PER EIGHTH AMENDMENT
137. ON OR NEAR 12.19.18, CONFIDENTIAL INTERVIEW, DEFENDANT, TICE, E; WARDEN DELIBERATE INDIFFERENCE TO PLAINTIFF FOOT FUNGUS CAUSING PLAINTIFF FEET TO BE COVERED IN OPEN SORES WHEREIN PLAINTIFF SOCKS WERE BLOODY. HAVING SEEN THIS DEFENDANT, E. TICE SAID I DON'T WANT TO SEE THE OTHER FOOT. ACCORDING TO DEFENDANT, TICE, HE WAS FULLY AWARE OF PLAINTIFF NEED OF MEDICAL CARE, PLAINTIFF WAS BEING PUNISHED FOR HAVING SUE MEDICAL STAFF-N-DOC STAFF ^{SEE: 21, 27-33, 35, 40}
138. ON OR NEAR 12.19.18, SAME EVENT, DEFENDANT, E. TICE, DENIED PLAINTIFF REQUEST FOR MEDICAL CARE (ALSO RELIGIOUS PRACTICE, RLUIPA RIGHT, EQUAL PROTECTION OF EMPLOYMENT), DECLARED, WHY, FUCK NO! AS LONG AS I AM WARDEN YOU BET NOTHING, EVEN IF IT MEANT YOUR SURVIVAL. I AM GOING TO PENALIZE YOU FOR YOUR CONTINUOUS COMMUNICATIONS WITH AUTHORITIES; FILING GRIEVANCES-N-LAW SUIT. BECAUSE DEFENDANT, E. TICE OBSERVED THE FACT THAT PLAINTIFF WAS NOT BEING PROVIDED MEDICAL CARE, DID NOT CORRECT THESE 1st, 8th, 14th AMENDMENT, RLUIPA RIGHTS ABUSES, DEFENDANT, TICE IS ALSO VIOLATING PLAINTIFF RIGHTS-N-CONSTITUTED CRUEL-N-UNUSUAL PUNISHMENT PER EIGHTH AMENDMENT ^{SEE 208, 209, 42-60, 220-224, 232, 236, 248, 249, 367, 31, 21}
139. ON OR NEAR 12.20.18, SICK CALL, FETTERMAN, CRNP, DELIBERATE INDIFFERENCE TO PLAINTIFF HAVING EXPERIENCED A NIGHT OF DIARRHEA, NON STOP PAIN-N-DISCOMFORT THROUGHOUT INTESTINAL TRACT, BOTH FEET COVERED IN OPEN SORES SOCKS IN BLOOD, AND OTHER CHRONIC HEALTH PROBLEMS, DEFENDANT, FETTERMAN LEAVES PLAINTIFF AND GOES TO THE NEXT ROOM AND CONFERES WITH DEFENDANT, R. PLAYSO (BASED WHAT PLAINTIFF HEARD)
140. ON OR NEAR 12.20.18, SAME EVENT, DEFENDANTS, R. PLAYSO, PAC, AND FETTERMAN, WHERE DEFENDANT, PLAYSO TOLD DEFENDANT, FETTERMAN, NO! DON'T GIVE A DAMN THING, JUST TELL PLAINTIFF TO LEAVE; DEFENDANT, FETTERMAN RETURNED, WITHOUT PROVIDING A CURSORY EXAM, TOLD PLAINTIFF TO LEAVE & DEFENDANTS, FETTERMAN-N-PLAYSO ACTIONS VIOLATED PLAINTIFF RIGHTS-N-CONSTITUTED CRUEL-N-UNUSUAL PUNISHMENT UNDER THE EIGHTH AMENDMENT ^{BY ACTING IN CONCERT; SEE: 153, 154, 159-144, 153, 158, 352, 354, 367, 21}
141. ON OR NEAR 12.24.18, SICK CALL, DEFENDANTS, FETTERMAN, B.P. HYDE-N-R. PLAYSO, COMPLAINT: W V. D

- CRNP-HEALTH CARE ADMINISTRATOR-N-PAC, DELIBERATE INDIFFERENCE TO PLAINTIFF NON STOP PAIN-N-DISCOMFORT CAUSED INTESTINAL GRIPE, TO SUCH A DEGREE PLAINTIFF WAS UNABLE TO STAND UPRIGHT; LITTLE OR NO EYESIGHT IN RIGHT EYE; AND INABILITY TO SPEAK ALOUD,
142. ON OR NEAR 12.24.18, SAME EVENT, DEFENDANT, FETTERMAN, RESPONDED TO PLAINTIFF BY LEAVING PLAINTIFF GOING TO B. P. HYDE OFFICE, AND ^{THE} TWO CAME OUT TOGETHER-N-BOTH ENTERED DEFENDANT, R. PLAYSO OFFICE LOCATED NEXT DOOR TO DEFENDANT, FETTERMAN OFFICE WHERE PLAINTIFF SAT NEAR THE DOOR WHEREIN PLAINTIFF HEARD DEFENDANTS PLAYSO-N-HYDE SAY TO DEFENDANT, FETTERMAN, THIS GUY IS SUING THE BOTH OF US, ^{SO DON'T} GIVE HIM SHIT; DEFENDANT, FETTERMAN, SAID, 'THIS GUY IS BAD OFF' SEE: 21, 354 367
143. ON OR NEAR 12.24.18, SAME EVENT, DEFENDANTS PLAYSO-N-HYDE, SAID IN ANGER, WHO GIVES A SHIT, 'FUCK HIM'. DEFENDANT, FETTERMAN, RETURNED AND TOLD PLAINTIFF TO GET OUT OF HIS OFFICE, PLAINTIFF, SAID PLEASE, AT LEAST GIVE PLAINTIFF SOME PAIN MEDICINE, DEFENDANT, FETTERMAN, SNAPPED: 'FUCK NO! NOW SUE ME TOO, JUST GO, WITHOUT DOING A CURSORY EXAM, PLAINTIFF WAS DENIED MEDICAL CARE, DEFENDANTS, FETTERMAN, PLAYSO-N-B. P. HYDE ACTIONS IN CONCERT VIOLATED PLAINTIFF RIGHTS-N-CONSTITUTED CRUEL-N-UNUSUAL PUNISHMENT, PER EIGHTH AMENDMENT: SEE 21; 52; 54; 139-142; 144; 153; 158; 265; 352; 354; 367
144. ON OR NEAR SICK CALL, DEFETTERMAN, CRNP, DELIBERATE INDIFFERENCE TO PLAINTIFF STRUGGLE TO STAND DUE TO A LACK OF STRENGTH AFTER A NIGHT OF DIARRHEA, AND NON STOP PAIN-N-DISCOMFORT IN THE INTESTINAL TRACT, AND OTHER CHRONIC HEALTH PROBLEMS. DEFENDANT FETTERMAN, RESPONDED, 'I DON'T GIVE A DAMN, ANYBODY CAN SEE YOU'RE ^{PAIN} IN, YOU DESERVE TO BE IN PAIN, YOU MAY AS WELL SUE ME, TOO. GET OUT OF MY OFFICE, NOT EVEN MEDICINE FOR PAIN, NO CURSORY EXAM, DEFENDANT, FETTERMAN ACTION VIOLATED PLAINTIFF RIGHTS-N-CONSTITUTE CRUEL-N-UNUSUAL PUNISHMENT PER EIGHTH AMENDMENT SEE: 21; 25; 52; 54; 139-143; 35; 41-65, 69, 56-60 265;
145. ON OR NEAR 1.18.19, SICK CALL, DEFENDANT, R. HUTCHINSON, DOCTOR; DELIBERATE INDIFFERENCE TO PLAINTIFF ANKLES SWOLLEN NEAR TWICE THEIR NORMAL SIZE; AND BLOODY SOCKS DUE TO OPEN SORES ON PLAINTIFF FEET CAUSED BY A FOOT FUNGUS. DEFENDANT, HUTCHINSON RESPONDED, YOU ARE SUING ME, I WOULD BE A FOOL TO HELP YOU; I AM CALLING THE SHOTS NOW; YOU CAN GET OUT OF MY OFFICE MR. WASHINGTON, NEXT TIME YOU'LL HESITATE IN WHO YOU'RE SUING
146. ON OR NEAR 1.18.19, SAME EVENT, DEFENDANT, HUTCHINSON NEVER TOUCHED PLAINTIFF PHYSICALLY TO PERFORM A CURSORY EXAM, SENT PLAINTIFF AWAY IN PAIN WITHOUT MEDICINE FOR PAIN. DEFENDANT, HUTCHINSON ACTION VIOLATED PLAINTIFF RIGHTS-N-CONSTITUTED CRUEL-N-UNUSUAL PUNISHMENT PER EIGHTH AMENDMENT.
147. ON OR NEAR 1.17.19, INCOMING MAIL, DEFENDANT, B. P. HYDE, (OR JOHN DOE) HEALTH CARE ADMINISTRATOR, DELIBERATE INDIFFERENCE, DISCARDED PLAINTIFF TIMELY SUBMITTED SICK CALL REQUEST BY RETURNING THE SICK CALL REQUEST TO PLAINTIFF IN THE INCOMING MAIL, DEFENDANT, HYDE PER POLICY SHOULD SCHEDULE A INMATE TO BE SEEN THE NEXT DAY AFTER RECEIVING A SICK CALL REQUEST, THIS CAUSED PLAINTIFF UNDERGO UNNECESSARY PAIN-N-SUFFERING COMPLAINT: W.V.D

DEFENDANT, HYDE ACTION VIOLATED PLAINTIFF RIGHTS-N-CONSTITUTED CRUEL-N-UNUSUAL PUNISHMENT PER EIGHTH AMENDMENT ^{SEES: 36, 39, 66, 29, 33, 42-60, 67, 70-72, 159-162, 210, 211, 216, 217, 248, 353, 354, 364, 367, 21, 27, 40}

178. ON OR NEAR 2.4.19, SICK CALL, DEFENDANT, E. KAUFFMAN, PAC, DELIBERATE INDIFFERENCE TO PLAINTIFF NON STOP PAIN-N-DISCOMFORT IN INTESTINAL TRACT TO SUCH A DEGREE SLEEP IS DISRUPTIVE; FINGERS, ELBOWS-N-ANKLES DEFORM, URETHRA STRICTURE, AND IRREVERSIBLE FOOT FUNGUS. DEFENDANT, KAUFFMAN RESPONSE WAS, "HE DON'T HAVE THE TIME TO HEAR BLACK MEN WHINE" THEN SUE HIM FOR NOT PROVIDING PLAINTIFF MEDICAL CARE. ^{SEE: 275, 21, 17, 138, 133, 24, 27, 40}
149. ON OR NEAR 2.4.19, SAME EVENT, DEFENDANT, KAUFFMAN NEVER TOUCHED PLAINTIFF PHYSICALLY FOR A CURSORY EXAM, NO MEDICINE FOR PAIN; TOLD PLAINTIFF TO LEAVE, DEFENDANT, KAUFFMAN ACTION VIOLATED PLAINTIFF RIGHTS-N-CONSTITUTED CRUEL-N-UNUSUAL PUNISHMENT PER EIGHTH AMENDMENT ^{SEE: 352}
150. ON OR NEAR 2.8.19, SICK CALL, DEFENDANT, K. DELISMA, MEDICAL DIRECTOR, DELIBERATE INDIFFERENCE TO PLAINTIFF EXPERIENCING NON STOP PAIN-N-DISCOMFORT IN INTESTINAL TRACT TO WHERE PLAINTIFF IS AWAKEN FROM HIS SLEEP; STRUGGLING TO SPEAK; AND OTHER CHRONIC HEALTH PROBLEMS. DEFENDANT, DELISMA, RESPONSE, "PLAINTIFF WAS CAUSING WE BLACK FOLKS TO LOOK WEAK IN THE EYES OF WHITE PEOPLE BY PLAINTIFF CONTINUOUS REQUEST FOR MEDICAL CARE WHEN BLACKS HAVE OBAMA CARE". NO CURSORY EXAM, NO MEDICINE FOR PAIN. DEFENDANT, DELISMA ACTION VIOLATED PLAINTIFF RIGHTS-N-CONSTITUTED CRUEL-N-UNUSUAL PUNISHMENT PER EIGHTH AMENDMENT ^{SEES: 21, 25, 52, 62, 86, 87, 352, 354, 367, 130, 134, 135, 155-157, 170-172, 259, 270, 27, 40}
151. ON OR NEAR 2.19.19, EYE EXAM, DEFENDANT, R. ERWIN, OPTOMETRIST, DELIBERATE INDIFFERENCE TO PLAINTIFF LOST OF EYESIGHT IN RIGHT EYE WHILE EXHIBITING SWELLING, AND PAIN WITH EACH MOVEMENT OF THE EYE. DEFENDANT, ERWIN ANGRY THAT PLAINTIFF FOR HAVING SUED HIM, TOLD PLAINTIFF, YOU CAN GO BLIND IN BOTH EYES FOR WHAT I CARE, REFUSED TO REFER PLAINTIFF TO THE OPHTHALMOLOGIST FOR LASER SURGERY ^{SEE: 21, 25, 68-72, 190, 197, 262, 276}
152. ON OR NEAR ~~2.19.19~~ ^{2.19.19}, SAME EVENT, DEFENDANT, ERWIN REFUSAL TO REFER PLAINTIFF TO A OPHTHALMOLOGIST FOR LASER SURGERY FORCED PLAINTIFF TO ENDURE UNNECESSARY PAIN-N-SUFFERING; AND ALLOWED PLAINTIFF LACK OF EYESIGHT TO GET WORST; DEFENDANT, ERWIN ACTIONS VIOLATED PLAINTIFF RIGHTS-N-CONSTITUTED CRUEL-N-UNUSUAL PUNISHMENT PER EIGHTH AMENDMENT ^{SEE: 21, 25, 350, 352, 24-26, 27, 42-51, 54, 56-60, 39, 40, 340-342, 367, 40, 363, 364}
153. ON OR NEAR 3.22.19, SICK CALL, DEFENDANT, TESTA, PACS, DELIBERATE INDIFFERENCE TO PLAINTIFF NON STOP PAIN-N-DISCOMFORT IN INTESTINAL TRACT. ACCOMPANIED BY DIARRHEA; AND SLEEP DISRUPTION. DEFENDANT, TESTA RESPONDED BY LEAVING PLAINTIFF TO GO TO THE OFFICE OF DEFENDANT, R. PLAYSO; PACS, NEXT DOOR; PLAINTIFF HEAR THEM TALKING; DEFENDANT, PLAYSO STATED, "HE IS SUING ME AND OTHERS IN THIS DEPARTMENT NEVER GIVE ^{HEM} ANYTHING, SEND HIM AWAY IMMEDIATELY", DEFENDANT, TESTA, SAID HE REALLY LOOKS TO BE BAD OFF. DEFENDANT, PLAYSO, SAYS, THAT DOESN'T MATTER, SEND HIM AWAY
154. ON OR NEAR 3.22.19, SAME EVENT, DEFENDANT, TESTA RETURNED, AND WITHOUT A CURSORY EXAM OR MEDICINE FOR PAIN, TOLD PLAINTIFF TO LEAVE AT ONCE. DEFENDANTS, PLAYSO-N-TESTA ACTED IN CONCERT VIOLATED PLAINTIFF RIGHTS-N-CONSTITUTED CRUEL COMPLAINT: W.V.D

- AND UNUSUAL PUNISHMENT PER EIGHTH AMENDMENT SEP: 153, 21, 205, 206, 35, 39, 40, 61-65, 166, 267
155. ON OR NEAR 4.2.19, SICK CALL, DEFENDANT, K. DELISMA, MEDICAL DIRECTOR, DELIBERATE INDIFFERENCE TO PLAINTIFF CHRONIC HEALTH PROBLEM, CAUSING A NEAR ZERO EYESIGHT IN RIGHT EYE, SLOW HEART RATE, DEFORMED FINGERS, ELBOWS-N-ANKLES, ALL TOE-NAILS DISCOLORED-N-Feet often covered in open sores; DEMENTIA; NON STOP PAIN-N-DISCOMFORT IN INTESTINAL TRACT TO SUCH A DEGREE PLAINTIFF IS AWKEN FROM SLEEP, PLAINTIFF BEGGED FOR MEDICINE TO RELIEVE THE PAIN, SEP: 25, 82, 84-87, 376, 130, 21,
156. ON OR NEAR 4.2.19, SAME EVENT, DEFENDANT, DELISMA, ANGRY WITH PLAINTIFF FOR FILING GRIEVANCE AGAINST DEFENDANT, DELISMA, AND FILING LAW SUITS AGAINST MEMBERS OF THE MEDICAL STAFF, WHICH IS NOW UNDER DEFENDANT, DELISMA SUPERVISION; AND PLAINTIFF CONTINUOUS COMMUNICATIONS WITH AUTHORITIES, DEFENDANT, DELISMA DECLARED, I PERSONALLY WARNED YOU, WHEN YOU DISCONTINUE FILING LAW SUITS-N-GRIEVANCES, AND COMMUNICATIONS WITH AUTHORITIES, THAT'S WHEN YOU GET PROPER MEDICAL CARE; PLAINTIFF DIDNT LISTEN; PLAINTIFF IS NOW FILING GRIEVANCES AGAINST DEFENDANT, DELISMA SEP: 163-165, 134, 135, 150, 130, 340, 364, 21
157. ON OR NEAR 4.2.19, SAME EVENT, DEFENDANT, DELISMA, DECLARED, YOU BROUGHT THIS ON YOURSELF, SO GO FIND YOUR MEDICAL CARE ELSEWHERE, NO MEDICINE FOR PAIN, NOT EVEN A CURSORY EXAM; DEFENDANT, DELISMA TOLD PLAINTIFF TO LEAVE HIS OFFICE. DEFENDANT, DELISMA ACTION VIOLATED PLAINTIFF RIGHTS-N-CONSTITUTED CRUEL-N-UNUSUAL PUNISHMENT PER EIGHTH AMENDMENT SEP: 27, 40, 62, 270, 259, 350, 344
158. ON OR NEAR 4.12.19; SICK CALL; DEFENDANT, TESTA, PACS, DELIBERATE INDIFFERENCE TO PLAINTIFF WEARING DARK SUNGLASSES, RIGHT EYE ~~SWOLLEN~~ SHUT-N-THROBBING EN PAIN, DEFENDANT, TESTA, LEFT PLAINTIFF AND CONFERRED WITH HER CO-MEDICAL PROFESSIONAL NEXT DOOR, WHERE PLAINTIFF HEAR SAY TO THAT PERSON WASHINGTON EYE IS SWOLLEN SHUT THE CO-WORKER TOLD HER SO WHAT SEND HIM AWAY, DEFENDANT, TESTA RETURNED AND DIDNT EXAM PLAINTIFF EYE, BUT DEFENDANT, TESTA BEGAN TO SCOLD PLAINTIFF IN RACIST OVERTONES; GAVE PLAINTIFF THE MIDDLE FINGER, SHOUTED, CAN YOU SEE THIS NOW GET OUT, DEFENDANT, TESTA ACTION VIOLATED PLAINTIFF RIGHTS-N-CONSTITUTED CRUEL-N-UNUSUAL PUNISHMENT AMENDMENT; SEP: 21, 26, 166, 344, 40, 27, 338-342, 363, 368
159. ON OR NEAR 5.6.19 - 5.8.19; MEDICAL EMERGENCY; DEFENDANT, B. P. HYDE, HEALTH CARE ADMINISTRATOR, DELIBERATE INDIFFERENCE; DEFENDANT, HYDE IS RESPONSIBLE FOR PROVIDING INMATES ACCESS TO MEDICAL CARE, WHICH INCLUDES SICK CALL-N-EMERGENCY MEDICAL CARE, PLAINTIFF AWAKEN UNABLE TO HEAR IN THE LEFT EAR, REPEATLY THE POD OFFICER OF AB CONTACTED THE HOSPITAL, i.e. SCI-SOMERSET MEDICAL STAFF. THE AB OFFICER ON THE SECOND-N-THIRD DID THE SAME. NO RESPONSE TO EACH CALL. SEP: 36, 352, 39, 66, 350
160. ON OR NEAR 5.6.19 - 5.18.19, SAME EVENT, PLAINTIFF SUBMITTED SICK CALL REQUEST PRIOR TO 5.6.19, AND ALSO ON 5.6.19, 5.7.19, 5.18.19; THE POD OFFICERS ON THE FIRST, SECOND, AND THIRD SHIFTS CALLED REPEATED ON PLAINTIFF BEHALF, NO RESPONSE TO EACH CALL. THE REASON THE POD OFFICERS CONTINUED TO CALL IS PLAINTIFF NAME WAS NOT PLACE ON THE CALL OUT FOR SICK CALL, THEREFORE, PLAINTIFF FOUR SICK CALL REQUEST WERE PROBABLY ALL DISCARDED. DURING THIS PERIOD PLAINTIFF EXPERIENCE PAIN-N-SWELLING COMPLAINT: W V D

- CLOSING THE EARHOLE, BEHIND THE EAR EXTENDING DOWN THE BACK OF THE NECK,
161. ON OR NEAR 5.6.19-5.8.19, SAME EVENT, FOR THE NEXT FOUR STRAIGHT WEEKS PLAINTIFF EXPERIENCED A LOSS OF HEARING IN THE LEFT EAR, PLAINTIFF LEFT EARHOLE REMAINED SWOLLEN SHUT FOR MORE THAN TWO WEEK, THE SWELLING BEHIND PLAINTIFF LEFT EAR-N-DOWN INTO THE NECK AREA COULD BE DETECTED FOR NEARLY A MONTH. HAD THE MEDICAL DEPARTMENT, i.e. STAFF RESPONDED TO MANY CALLS BY AB PD OFFICERS AND/OR RESPONDED TO PLAINTIFF FOUR TIMELY SUBMITTED SICK CALL REQUEST, AS WELL AS THE TWO-THREE SICK CALL REQUEST PLAINTIFF WOULD NOT UNDERGONE SUCH UNNECESSARY PAIN-N-SUFFERING ^{SEE: 21; 36, 39; 66, 350, 352, 142, 143, 147, 159-160, 162, 183, 52} 376
162. ON OR NEAR 5.6.19-5.8.19, SAME EVENT, DEFENDANT, B. P. HYDE ~~NON~~ NON RESPONSE TO NUMERS CALL FOR EMERGENCY, AND NON RESPONSE TO PLAINTIFF MANY TIMELY SUBMITTED SICK CALL REQUEST IS A DENIAL OF ACCESS TO MEDICAL CARE VIOLATED PLAINTIFF RIGHTS-N-CONSTITUTED CRUEL-N-UNUSUAL PUNISHMENT PER EIGHTH AMENDMENT ^{376; 159-161; 210-211; 29; 31; 30; 70-72; 52;}
163. ON OR NEAR 5.30.19, SICK CALL, DEFENDANT, K. DELISMA, MEDICAL DIRECTOR; DELIBERATE INDIFFERENCE TO PLAINTIFF FEET COVERED IN BLOOD DUE TO FOOT FUNGUS; STILL EXPERIENCING A LOSS OF HEARING IN LEFT EAR; AND NON STOP PAIN-N-DISCOMFORT IN INTESTINAL TRACT. DEFENDANT, DELISMA, RESPONDED BY WALKING OUT OF THE OFFICE, THEN BEGIN A CONVERSATION WITH SOMEONE, THEN RETURNED, DECLARED TO PLAINTIFF, "I AM VERY HAPPY YOU'RE IN PAIN", "PAIN IS GOOD FOR YOU" ^{SEE: 134; 150; 376}
164. ON OR NEAR 5.30.19, SAME EVENT, DEFENDANT, DELISMA ~~WENT~~ BORTHER TO CONDUCT A CURSORY EXAM; LAUGHING UNCONTROLLABLY, DEFENDANT, DELISMA POINTING TO THE DOOR AS HE LAUGHED, OUT, GET THE FUCK OUT; AND AS PLAINTIFF LUMBERED AWAY DEFENDANT, DELISMA STATED, "FILE A BRIEVANCE ON THAT". DEFENDANT, DELISMA ACTS VIOLATED PLAINTIFF RIGHTS-N-CONSTITUTED CRUEL-N-UNUSUAL PUNISHMENT PER EIGHTH AMENDMENT ^{SEE: 21-33, 35, 40, 42-45, 67-71, 87, 52, 54, 130-131, 134-136, 150, 155-157, 163-172, 174-176, 213, 244, 259, 270, 352, 352-354, 363, 364, 367, 376}
165. ON OR NEAR 6.17.19, SICK CALL, DEFENDANTS, K. DELISMA-MEDICAL DIRECTOR, AND TESTA, PACS; DELIBERATE INDIFFERENCE TO PLAINTIFF SERIOUS MEDICAL NEEDS, i.e. DUE TO NON STOP PAIN-N-DISCOMFORT IN INTESTINAL TRACT PLAINTIFF OBTAIN LESS THAN SIX HOURS SLEEP IN THE LAST 4 DAYS, WHILE WAITING IN THE LOBBY DEFENDANT, DELISMA PASSING THROUGH DEFENDANT, DELISMA CAME OVER TO PLAINTIFF, DECLARED, "WASHINGTON, MAN, ARE YOU GOING TO MAKE IT INSIDE, YOU LOOK JUST LIKE YOU'RE AT DEATH'S DOOR" ^{SEE: 175, 176, 177, 270, 166}
166. ON OR NEAR 6.17.19, SAME EVENT, DEFENDANT, TESTA, WHEN PLAINTIFF WAS CALLED INSIDE, BEFORE PLAINTIFF COULD TAKE A SEAT, DEFENDANT ^{TESTA} RUSHED OUT OF DEFENDANT, DELISMA OFFICE; SAID TO PLAINTIFF, AS SHE HELD THE MIDDLE FINGER OF BOTH HAND EXTENDED, ~~THESE~~ THESE ARE FOR YOU, DON'T SIT DOWN, DEFENDANT, DELISMA, HAD SPOKE TO PLAINTIFF IN THE LOBBY. NOT EVEN A CURSORY EXAM. DEFENDANTS, DELISMA-N-TESTA ACTION VIOLATED PLAINTIFF RIGHTS-N-CONSTITUTED CRUEL-N-UNUSUAL PUNISHMENT PER 8TH AMD.
- COMPLAINT: W.V.D

167. ON OR NEAR 8.1.19, SICK CALL, DEFENDANT, K. DELISMA, DELIBERATE INDIFFERENCE TO PLAINTIFF NON STOP PAIN-N-DISCOMFORT IN THE INTTESTINAL TRACT CAUSING PLAINTIFF TO BE AWAKEN FROM SLEEP, OPEN SORES ON BOTH FEET, PERIODIC LOSS HEARING IN LEFT EAR, URETHRA STRICTURE WHEREIN PLAINTIFF IS FORCED TO KEEP HIS PENIS WRAPPED IN TOILET PAPER; PLAINTIFF BEGGED DEFENDANT, DELISMA FOR MEDICINE FOR PAIN, DEFENDANT, DELISMA, USED THE MIDDLE RAISED ON BOTH HAND, HELD UP WITHIN INCHES OF PLAINTIFF FACE, AS DEFENDANT, DELISMA USED A TWISTING MOTION WITH BOTH HANDS-N-FINGERS; THEN TOLD PLAINTIFF TO GET THE FUCK OUT,
168. ON OR NEAR 8.1.19, SAME EVENT, DEFENDANT, DELISMA ACTIONS VIOLATED PLAINTIFF RIGHTS-N-CONSTITUTED CRUEL-N-UNUSUAL PUNISHMENT PER EIGHTH AMENDMENT
169. ON OR NEAR 9.5.19, IN TRAVEL; DEFENDANT, DELISMA, MEDICAL DIRECTOR; DELIBERATED INDIFFERENCE TO HAVING RECOGNIZED PLAINTIFF ON THE SIDE AS DEFENDANT, DELISMA WAS IN ROUTE TO STAFF DINING HALL. DEFENDANT, DELISMA, K. STOPPED PLAINTIFF AND ASKED PLAINTIFF, ARE YOU GOING MAKE IT? YOU'RE LIMPING IS IT YOUR FEET AGAIN? WHY ARE YOU CROUCHING? PLAINTIFF SAID PLEASE HELP ME, MY FEET ARE BLEEDING, MY STOMACH IS KILLING ME, I AM HURTING. PLEASE SOMETHING IMMEDIATELY
170. ON OR NEAR 9.5.19; SAME EVENT, DELISMA, K.; (PRIOR TO AND AFTER ^{PLAINTIFF} SUBMITTED TWO-THREE SICK CALL, MORE THAN SIX STRAIGHT WEEKS PLAINTIFF SICK CALL REQUEST HAVE BEEN DISCARDED) RESPONDED, PLAINTIFF CONTINUED TO COMMUNICATE WITH AUTHORITIES, FILING BRIEVANCES AGAINST DEFENDANT, K. DELISMA PERSONALLY; AND FILING LAW SUITS AGAINST STAFF UNDER DEFENDANT, DELISMA SUPERVISION, SO AS A PUNISHMENT DEFENDANT, DELISMA WOULD NOT PROVIDE PLAINTIFF MEDICAL CARE; PLAINTIFF WAS ON HIS OWN, DEFENDANT, K. DELISMA ACTIONS VIOLATED PLAINTIFF RIGHTS-N-CONSTITUTED CRUEL-N-UNUSUAL PUNISHMENT PER EIGHTH AMENDMENT SEE: 21-29, 35, 36, 39, 40, 41-62, 70, 71, 82-87, 348, 350, 352, 354, 356, 362-364, 363, 370

COUNT TWO: EQUAL PROTECTION

171. PLAINTIFF ALLEGES AND INCORPORATES BY REFERENCE PARAGRAPHS 1-THROUGH 170
172. PLAINTIFF IS A MEMBER OF A PROTECTED CLASS? A PERSON WHO BENEFIT FROM PROTECTION BY STATUTE SUCH AS TITLE VII, OF THE CIVIL RIGHTS ACT OF 1964, WHICH PROHIBITS DISCRIMINATION BASED ON RACE, NATION ORIGIN OR RELIGION
173. PLAINTIFF ALLEGES TO BE A MEMBER OF A PROTECTED CLASS BASED ON PLAINTIFF RACE, PLAINTIFF AGE, AND PLAINTIFF RELIGIOUS BELIEFS. PLAINTIFF, A 75 YEAR OLD DARK SKIN BLACK MALE, FOUNDER-N-LEADER OF THE 'CHILDREN OF THE SUN CHURCH'; PLAINTIFF THE ACKNOWLEDGED FOUNDER-N-LEADER OF THE CHILDREN OF THE SUN CHURCH, BASKET BALL OFFICIAL SINCE 1965; SOFTBALL UMPIRE SINCE 1956; FOOTBALL, AND VOLLEY BALL OFFICIAL; UNQUESTIONABLY QUALIFIED; PLAINTIFF SUFFERED FROM SOME FORMS OF ADVERSE EMPLOYMENT ACTION, ACCESS TO RELIGIOUS PRACTICE, MEDICAL CARE, AND RETALIATION
174. DEFENDANTS, K. DELISMA, WILLIAM L. BOWERS, PHILLIP MAUST, HEIDI COM PLAIN: W V, D

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SROKA, ROBERT SNYDER, R. PESCHOCK, J. GIRONI, ELLIS KAUFFMAN, RICHARD IRWIN,
ROXANNE PLAYSO, LARENE DARLING, FETTERMAN, RICHARD HUTCHINSON, TESTA,
ERIC TICE, BRIAN (B.P.) HYDE
PER RETALIATION CONDUCT OCCURRED WHERE OTHER INMATES IN SIMILAR SITUATED
WERE PROVIDED SERVICES-N-OPPORTUNITIES, WHOM ARE ~~NOT~~^{NOT} A PROTECTED CLASS; YOUNGER,
AND LESS QUALIFIED. SEE: 1-376 PRISM

175. PLAINTIFF WAS SINGLED OUT AS A CLASS OF ONE; DEFENDANTS, K. DELISMA, WILLIAM
L. BOWERS, PHELLIP MAUST, HEIDI SROKA, ROBERT SNYDER, R. PESCHOCK, J. GIRONI,
ELLIS KAUFFMAN, RICHARD IRWIN, ROXANNE PLAYSO, LARENE DARLING, FETTER-
MAN, RICHARD HUTCHINSON, TESTA, ERIC TICE, BRIAN (B.P.) HYDE

RETALIATORY ACTIONS WERE INTENTIONAL, IRRATIONAL AND DONE REGULARLY

176. ON OR NEAR 11.27.18; 12.13.18; 2.8.19; 4.2.19; 5.30.19; 6.17.19; 8.1.19; 9.5.19, SICK
CALL, DEFENDANT, K. DELISMA, MEDICAL DIRECTOR, DISCRIMINATED AGAINST PLAINTIFF;
TREATED PLAINTIFF AS A CLASS OF ONE; AND FOR NO RATIONAL REASON, i.e. RACE, TO PENAL-
IZE PLAINTIFF FOR COMMUNICATIONS WITH AUTHORITIES; NON MEDICAL REASONS. DEFENDANT,
DELISMA ACTION VIOLATED PLAINTIFF EQUAL PROTECTION RIGHTS PER 14th AMENDMENT
SEE: 130, 131; 135, 150; 155-157; 163-168; 169, 170,

177. ON OR NEAR 10.6.17; 1.9.18; 4.9.18; 9.10.19; DEFENDANT, WILLIAM L BOWERS TO
DATE! HOUSING; RELIGIOUS PRACTICE; A-BLOCK UNIT MANGER FOR NO RATIONAL
REASONS, TARGET, INTENTIONALLY DISCRIMINATED AGAINST PLAINTIFF, RETALIATORY TR-
EATED PLAINTIFF AS A CLASS OF ONE. SEE: 106-112; 250; 251, 214, 217; 221, 222, 224, 237, 240, 243

178. ON OR NEAR 10.6.17, CONTINUED UNTIL ON OR NEAR 2.18.19; HOUSING; DEFENDANT,
BOWERS, SAME EVENT; ASSIGNED ALL OTHER OTHER INMATES, ESPECIALLY WHITE
WHITE INMATES TO THE CELL OF THEIR CHOICE UPON REQUEST, EVEN WITH FOREKNOW-
LEDGE OF THE RISK TO PLAINTIFF MENTAL HEALTH, BASED ON NON PENOLOGICAL INTER-
EST, i.e. RACE, RETALIATION, PENALTY FOR COMMUNICATIONS WITH AUTHORITIES.

179. DEFENDANT, BOWERS DISREGARDED THE RISK, CONTINUED TO FORCE! PLAINTIFF TO HOUSE
UNTIL 2.18.19, WHERE ^{DU TO THE} LOCATION OF THE CELL CONTINUOUSLY CAUSED PLAINTIFF PSY-
CHOLOGICAL PROBLEMS, PRIOR TO 2.18.19, DEFENDANT, BOWERS HAD NEVER ASSIGNED
A WHITE INMATE TO HOUSE IN SUCH CELL, DEFENDANT, BOWERS ACTIONS VIOLATED
PLAINTIFF RIGHTS-N-CONSTITUTED CRUEL-N-UNUSUAL PUNISHMENT PER 8th AMENDMENT
AND EQUAL PROTECTION PER 14th AMENDMENT SEE: 106-112

180. ON OR NEAR 9-10.19, RELIGIOUS PRACTICE; WILLIAM L. BOWERS FOR NO RATIONAL REA-
SONS, RETALIATED/INTENTIONALLY DISCRIMINATED AGAINST PLAINTIFF-N-TREATED AS
A CLASS OF ONE. SEE: 106-112, 121, 213-224; 236, 237, 240, 243; 245; 250; 251, 271; 177-179; 181

181. DEFENDANT, BOWERS ON A DAILY BASIS SUCCESSFULLY RECOGNIZED PRIOR COURT APPROV-
ED COURT ORDERS /AND/OR SOI-SOMERSET APPROVED EXCEPTION FOR EXTRA PROPERTY IN
SIDE THE INMATES ESPECIALLY THE RELIGIOUS PROPERTY OF WHITE INMATES, BASED ON
NON PENOLOGICAL REASONS, i.e. RACE, RELIGIOUS BELIEFS, RETALIATIONS, PENALTY FOR COM-
MUNICATION WITH AUTHORITIES, DEFENDANT, BOWERS DENIED PLAINTIFF RELIGIOUS LITERAT-
URE, BY USE OF THE MOST RESTRICTIVE MEANS, DEFENDANT, BOWERS ACTIONS CONSTITUTED
RLUIPA-N-EQUAL PROTECTION VIOLATIONS PER 42 USC 2000cc-N-14th AMENDMENT SEE 225,

COMPLAINT: W V. D 232, 236, 250, 251, (21) 271

182. ON OR NEAR 8.21.17, RELIGIOUS PRACTICE, DEFENDANT, MAUST, CHAPLAIN, FOR NO RATIONAL REASONS, RETALIATED/INTENTIONALLY DISCRIMINATED AGAINST PLAINTIFF-N-TREATED PLAINTIFF AS A CLASS OF ONE, 18 USC 133247; 71 P.S. § 581-1; SEE 213, 217, 218, 221-229, 236, 244, 255-257, 183.
183. DEFENDANT, MAUST ON A DAILY BASIS SUCCESSFULLY PROVIDED RELIGIOUS LITERATURE TO ALL OTHER INMATES, ESPECIALLY INMATES OF NON AFRICAN BELIEFS, WHITES IN PARTICULAR, BASED ON NON PENOLOGICAL REASONS, I.E. RACE, RELIGIOUS BELIEFS, RETALIATION, PENALTY FOR COMMUNICATIONS WITH AUTHORITIES. DEFENDANT, MAUST DENIED PLAINTIFF RELIGIOUS LITERATURE, BY THE USE OF THE MOST RESTRICTIVE MEANS, DEFENDANT, MAUST ACTIONS CONSTITUTES RLUIPA, RELIGIOUS PRACTICE AND EQUAL PROTECTION VIOLATIONS PER 42 USC 2000cc 1-5; 1st-N-14th AMENDMENTS
184. BEGINNING ON OR NEAR 7.16.15 CONTINUED UNTIL REASSIGNMENT, DENIAL TO ADM 804 INMATE GRIEVANCE SYSTEM; DEFENDANT, H. SROKA, WARDEN'S ASSISTANT FOR NO RATIONAL REASON TARGETED, RETALIATED/INTENTIONALLY DISCRIMINATED AGAINST PLAINTIFF AND TREATED PLAINTIFF AS A CLASS OF ONE SEE 213, 214, 232, 236, 244-247
- DEFENDANT, SROKA PROCESSED THE TIMELY SUBMITTED GRIEVANCES OF ALL OTHER INMATES. BASED ON NON PENOLOGICAL REASONS, I.E. RACE, RETALIATION, PENALTY FOR COMMUNICATIONS WITH AUTHORITIES, DEFENDANT SROKA DID NOT PROCESS NUMEROUS OF PLAINTIFF TIMELY SUBMITTED GRIEVANCES. N.B. ALL REQUESTED MONETARY RELIEF. DEFENDANT SROKA ACTION CONSTITUTE FREE SPEECH-N-EQUAL PROTECTION PER 1st-N-14th AMENDMENT, SEE 89-93. 100-105, 184, 232, 236, 244-247, 340-348, 357, 370-372, 74, 71, 30, 31, 35, 37-60.
185. ON OR NEAR 4.8.17 - ONGOING UNTIL DEFENDANT, R. SNYDER, WAS REASSIGNED, SECURITY CAPTAIN/MAJOR, FOR NO RATIONAL REASONS, TARGETED, RETALIATED/INTENTIONALLY DISCRIMINATED AGAINST PLAINTIFF-N-TREATED PLAINTIFF AS A CLASS OF ONE
186. DEFENDANT, SNYDER SUCCESSFULLY THROUGHOUT THE COURSE OF THE DAY ON A DAILY BASIS PROVIDED SAFETY FOR ALL OTHER INMATES, ESPECIALLY WHITE INMATES. BASED ON NON PENOLOGICAL REASONS, RACE, RELIGIOUS BELIEFS, PENALTY FOR COMMUNICATIONS WITH AUTHORITIES, DEFENDANT, R. SNYDER AIDED-N-ABETTED TWO YOUNG "WHITE INMATES" TO SUCCESSFULLY STEAL PLAINTIFF RELIGIOUS BOOKS, DEFENDANT, R. SNYDER ACTIONS VIOLATED PLAINTIFF RIGHTS AND CONSTITUTE DENIAL OF RELIGIOUS PRACTICE, RLUIPA-N-EQUAL PROTECTION UNDER 42 U.S.C. 2000cc 1-5; 18 USC 133247; 71 P.S. § 581-1; AND 1st, -N-14th AMENDMENTS SEE 213, 214, 232, 236, 244, 252-254, 27, 35, 42-51, 56-60
187. ON OR NEAR 4.11.18, AND THROUGHOUT THE BASKETBALL SEASON; EMPLOYMENT, DEFENDANT, R. PESCHOCK, ACTIVITIES SPECIALIST FOR NO RATIONAL REASONS INTENTIONALLY, TARGETED, RETALIATED, DISCRIMINATED AGAINST PLAINTIFF, AND TREATED PLAINTIFF AS A CLASS OF ONE. SEE 213, 244, 188-191, 273, 340, 341, 351, 358-364, 376
188. DEFENDANT, PESCHOCK, SAME EVENTS, DURING MORE THAN THREE CONFIDENTIAL INTERVIEWS, DEFENDANT, PESCHOCK DECLARED, "SHE CAN'T STAND THE GAME OF BASKETBALL", "SHE DOESN'T WATCH THE GAMES PLAYED UNDER HER SUPERVISION", "SHE'S NOT CONCERN ABOUT HOW EFFICIENT BASKETBALL OFFICIAL PERFORM THEIR DUTIES ON THE FLOOR", "SHE ASSIGNED INMATES ACCORDING TO THEIR AGE". SEE 213, 214, 27, 35, 37-51, 56-60.
189. SAME EVENT, DEFENDANT, PESCHOCK CONSISTENTLY BY PASSED PLAINTIFF BASED ON COMPLAINT: W.V.D

- NON PENOLOGICAL REASONS, I.E. AGE, CLICKS FOUNDED ON GAMES, GEOGRAPHICAL AFFILIATION. DEFENDANT, PESCHOCK ASSIGNED PLAINTIFF TO MENIAL ROLES, I.E. SWEEPING THE FLOOR CHASING LOOSE BASKETBALLS, FOLDING JERSEYS; WHILE ASSIGNING INMATES WITH LESS THAN HALF THE EXPERIENCE THAT PLAINTIFF HAS, LESS FOOT SPEED, OFTEN LAZY; TO CENTRAL ROLES I.E. OFFICIATING THE GAME. SEE: 27, 35, 42-51, 56-60, 376.
190. SAME EVENTS, DEFENDANT, PESCHOCK READILY ADMITTED, THAT DURING THE LIMITED OFFICIATING PLAINTIFF WAS ASSIGNED NOT ONCE WAS THE GAME STOPPED OR DELAYED DUE TO PLAINTIFF BEING EXHAUSTED, OR INABILITY TO KEEP UP. DEFENDANT, PESCHOCK CONSISTENTLY ASSIGNED INMATES WHO STOOD IN ONE SPOT INSTEAD OF MOVING WITH THE FLOW OF THE GAME, WHO CONSISTENTLY-N-CONSTANTLY ENGAGED IN VERBAL SPARRING WITH THE PLAYERS DURING THE GAME, INSTRUCTING PLAYERS-N-COACHES ON HOW TO SUCCESSFULLY WIN THE GAME, OPENLY CRITICIZED FELLOW OFFICIAL DURING THE COURSE OF THE GAME.
191. SAME EVENTS, PLAINTIFF REPEATEDLY REQUESTED TO BE ASSIGNED TO OFFICIATE THE GAME DURING EACH CONFIDENTIAL INTERVIEW WITH DEFENDANT, PESCHOCK WHO REFUSED TO DO SO BASED ON NON PENOLOGICAL REASONS, WHICH TO DATE, I CONTINUE TO FOSTER, AND AIDED-N-ABETTED THE STILL ONGOING WORKINGS OF A CLICK; WILLINGLY OR UNWITTINGLY. DEFENDANT, PESCHOCK ACTIONS CONSTITUTED EQUAL PROTECTION VIOLATIONS PER 14TH AMENDMENT 244, 273, 27, 35, 42-51, 56-60, 376.
192. ON OR NEAR 1.15.18; SICK CALL, DEFENDANT, J. GIBONE, DOCTOR, FOR NO RATIONAL REASON, TARGETED, RETALIATED/INTENTIONALLY DISCRIMINATED AGAINST PLAINTIFF-N-TREATED PLAINTIFF AS A CLASS OF ONE. SEE: 52, 113-115, 27, 42-51, 56-60, 213, 240, 260, 274, 364, 352-354, 52, 21, 346, 376, 364.
193. DEFENDANT, GIBONE WHILE CONDUCTING THE SAME SICK CALL PROVIDED MEDICAL CARE SUCCESSFULLY FOR ALL OTHER INMATES ESPECIALLY WHITE INMATES, BASED ON NON MEDICAL REASONS, I.E. RACE, RETALIATION, PENALTY FOR COMMUNICATION WITH AUTHORITIES. DEFENDANT, GIBONE DENIED PLAINTIFF MEDICAL CARE. DEFENDANT, GIBONE ACTIONS CONSTITUTED VIOLATIONS OF PLAINTIFF EQUAL PROTECTION RIGHTS PER 14TH AMENDMENT 364, 367.
194. ON OR NEAR 3.13.18; 4.3.18, 11.6.18; 12.4.18; 2.4.19; DEFENDANT, E. KAUFFMAN, DOCTOR, FOR NO RATIONAL REASON TARGETED, RETALIATED/INTENTIONALLY DISCRIMINATED AGAINST PLAINTIFF-N-TREATED PLAINTIFF AS A CLASS OF ONE. SEE: 261, 195, 56-60, 52.
195. DEFENDANT, KAUFFMAN WHILE CONDUCTING THE SAME SICK CALL SUCCESSFULLY PROVIDED MEDICAL CARE FOR ALL OTHER INMATES, ESPECIALLY WHITE INMATES, BASED ON NON MEDICAL REASONS, I.E. RACE, RETALIATION, PENALTY FOR COMMUNICATIONS WITH AUTHORITIES. DEFENDANT, KAUFFMAN DENIED PLAINTIFF MEDICAL CARE. DEFENDANT, KAUFFMAN ACTIONS VIOLATED PLAINTIFF EQUAL RIGHTS CONSTITUTES EQUAL PROTECTION; PER 14TH AMENDMENT SEE: 52, 116-120, 123, 128, 132, 133, 148, 132, 213, 244, 261, 275, 27, 42-51, 261.
196. ON OR NEAR 9.27.17, 10.18.17; 2.19.19; EYE EXAMINATION, DEFENDANT, R. IRWIN, OPTOMETRIST, TARGETED, RETALIATED/INTENTIONALLY DISCRIMINATED AGAINST PLAINTIFF FOR NO RATIONAL REASON, I.E. RACE, PENALTY FOR COMMUNICATIONS WITH AUTHORITIES, AND TREATED PLAINTIFF AS A CLASS OF ONE. SEE: 197, 262, 276, 27, 42-51, 56-60, 213, 244, 52.
197. DEFENDANT, IRWIN WHILE CONDUCTING THE SAME SESSION OF EYE EXAMINATION PROVIDED ALL OTHER INMATES SUCCESSFULLY, ESPECIALLY WHITE INMATES, MEDICAL CARE. TARGETED.
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ED PLAINTIFF TO DENY MEDICAL CARE BASED ON NON MEDICAL REASONS, i.e. RACE, RETALIATION, PENALTY FOR COMMUNICATIONS WITH AUTHORITIES, DEFENDANT, IRWIN ACTIONS VIOLATED PLAINTIFF RIGHTS TO EQUAL PROTECTION UNDER THE 14TH AMENDMENT, SEE 27, 42-51, 56-60, 198. ON OR NEAR 12.24.18; 3.22.19, SICK CALL, DEFENDANT, R. PLAYSO, PACS SUCCESSFULLY PROVIDED MEDICAL CARE TO ALL OTHER INMATES, FOR NO RATIONAL REASON TARGETED, RETALIATED/INTENTIONALLY DISCRIMINATED AGAINST PLAINTIFF-N-TREATED PLAINTIFF AS A CLASS OF ONE SEE 27, 263, 27, 42-51, 56-60, 213, 244, 52, 139, 143, 158, 244, 250, 350, 351-354, 340-342, 364, 376, 199, DEFENDANT, PLAYSO, WHILE CONDUCTING THE SAME SICK CALL SUCCESSFULLY PROVIDED MEDICAL CARE TO ALL OTHER INMATES, ESPECIALLY WHITE INMATES, DENIED PLAINTIFF MEDICAL CARE BASED ON NON MEDICAL REASONS, i.e. RACE, RETALIATION, PENALTY FOR COMMUNICATIONS WITH AUTHORITIES, DEFENDANT, PLAYSO ACTIONS VIOLATED PLAINTIFF RIGHTS TO EQUAL PROTECTION PER 14 AMENDMENT SEE 198, 52, 54, 21-33, 42-51, 56-65, 174, 175, 340-342, 350-354, 364, 376, 200. ON OR NEAR 7.2.18, SICK CALL, DEFENDANT, LARENE DARLING, NURSE PRACTITIONER: NP, FOR NO RATIONAL REASONS TARGETED, RETALIATED/INTENTIONALLY DISCRIMINATED AGAINST PLAINTIFF, AND TREATED PLAINTIFF AS A CLASS OF ONE SEE 213, 244, 364, 278, 52, 350-354, 201. DEFENDANT, DARLING SUCCESSFULLY PROVIDED MEDICAL CARE FOR ALL OTHER INMATES, ESPECIALLY WHITE INMATE BASED ON NON MEDICAL REASONS, i.e. RETALIATED, RACE, PENALTY FOR COMMUNICATIONS WITH AUTHORITIES, DEFENDANT, DARLING ACTION VIOLATED PLAINTIFF RIGHTS TO EQUAL PROTECTION PER 14TH AMENDMENT SEE 27, 42-51, 54-60, 122, 340-342, 364, 376, 201. ON OR NEAR 12.20.18, 12.24.18, AND A UNDATED EVENT, SICK CALL, DEFENDANT, FETTERMAN, CRNP, FOR NO RATIONAL REASON RETALIATION, TARGETED, INTENTIONALLY DISCRIMINATED AGAINST PLAINTIFF-N-TREATED PLAINTIFF AS A CLASS OF ONE SEE 52, 213, 244, 266, 27, 42-51, 56-60, 213, 122, 370-377, 350-354, 202. DEFENDANT, FETTERMAN, WHILE CONDUCTING THE SAME ASSIGNMENT SUCCESSFULLY PROVIDED ALL OTHER INMATES, ESPECIALLY WHITE INMATES, DENIED PLAINTIFF MEDICAL CARE BASED ON NON MEDICAL REASONS, i.e. RACE, RETALIATION, PENALTY FOR COMMUNICATIONS WITH AUTHORITIES, WHICH VIOLATED PLAINTIFF RIGHTS TO EQUAL PROTECTION, PER 14TH AMENDMENT, 203. ON OR NEAR 1.18.19, SICK CALL, DEFENDANT, R. HUTCHINSON, PACS, FOR NO RATIONAL REASONS, TARGETED, RETALIATED/INTENTIONALLY DISCRIMINATED AGAINST PLAINTIFF-N-TREATED PLAINTIFF AS A CLASS OF ONE. SEE 204, 213, 340-341, 350-354, 364, 376, 139-146, 204. DEFENDANT, HUTCHINSON, WHILE CONDUCTING THE SAME SUCCESSFULLY SICK CALL PROVIDED TO ALL OTHER INMATES, ESPECIALLY WHITE INMATES, BASED ON NON MEDICAL REASONS, i.e. RACE, RETALIATION, PENALTY FOR COMMUNICATING WITH AUTHORITIES DEFENDANT, HUTCHINSON DENIED PLAINTIFF MEDICAL CARE. DEFENDANT, HUTCHINSON ACTIONS VIOLATED PLAINTIFF RIGHTS PER 14TH AMENDMENT SEE 203, 213, 244, 266, 27, 42-51, 56-60, 21-41, 205. ON OR NEAR 3.22.19, 4.12.19, 6.17.19, SICK CALL, DEFENDANT, D. TESTA, FOR NO RATIONAL REASONS TARGETED, RETALIATED/INTENTIONALLY DISCRIMINATED AGAINST PLAINTIFF-N-TREATED PLAINTIFF AS A CLASS OF ONE SEE 267, 244, 153, 154, 166, 206, 213, 244, 27, 206. DEFENDANT, D. TESTA, WHILE CONDUCTING THE SAME SICK CALL, SUCCESSFULLY PROVIDED ALL OTHER INMATES WITH MEDICAL CARE, ESPECIALLY WHITE INMATES, BASED ON NON MEDICAL REASONS, i.e. RACE, RETALIATION, PENALTY FOR COMMUNICATIONS WITH AUTHORITIES, DENIED PLAINTIFF MEDICAL CARE, DEFENDANT, D. TESTA ACTIONS COMPLAINT: W V. D.

- VIOLATED PLAINTIFF RIGHTS TO EQUAL PROTECTION PER 14th AMENDMENT
207. ON OR NEAR 11.7.18; 12.19.18; 7.19.19, CONFIDENTIAL INTERVIEWS, DEFENDANT, TICE, WARDEN FOR NO RATIONAL REASONS RETALIATED/INTENTIONALLY DISCRIMINATED-N-TARGETED PLAINTIFF, AND TREATED PLAINTIFF AS A CLASS OF ONE; SEE 138; 208, 209; 213, 217; 220-224
208. DEFENDANT, TICE BEING ACUTELY AWARE THAT PLAINTIFF WAS WAS CURRENTLY BEING MISTREATED BY MEDICAL PROFESSIONALS-N-DOC STAFF UNDER DEFENDANT TICE SUPERVISION, DEFENDANT, TICE WHO SUCCESSFULLY INTERVENE-N-CORRECT MISTREATMENT OF ALL OTHER INMATES, ESPECIALLY WHITE INMATES, BASED ON NON PENOLOGICAL REASONS ENCOURAGED MEDICAL PROFESSIONALS-N-DOC STAFF TO MISTREAT PLAINTIFF, AND HE ALSO TOOK PART IN THE MISTREATMENT SEE: 30, 31; 209; 230, 233, 244; 249, 249, 367
209. DEFENDANT, TICE, BASED ON NON PENOLOGICAL REASONS, RACE, RELIGIOUS BELIEF, RETALIATED, PENALTY FOR COMMUNICATIONS WITH AUTHORITIES, DENIED PLAINTIFF RIGHTS GUARANTEED BY THE FIRST AND EIGHTH AMENDMENT, DEFENDANT, TICE SUCCESSFULLY PROVIDED ALL OTHER INMATES, ESPECIALLY WHITE INMATES GUARANTEED BY THE FIRST-N-EIGHTH AMENDMENT. DEFENDANT, TICE ACTIONS-N-ACTIONS VIOLATED PLAINTIFF RIGHTS TO EQUAL PROTECTION PER 14th AMENDMENT
210. ON OR NEAR 12.24.18; 1.17.19; 5.6.19-5.8.19; ACCESS TO MEDICAL CARE, DEFENDANT, B.P. HYDE (ALSO ON OR NEAR 8.7.18, 17; 8.11.17; 9.27.17; 12.28.17) FOR NO RATIONAL REASONS TARGETED, INTENTIONALLY DISCRIMINATED, RETALIATED AGAINST PLAINTIFF AND TREATED PLAINTIFF AS A CLASS OF ONE SEE: 27, 30; 40-60, 42, 143, 147, 159-162; 211; 283, 340-342; 350-354, 364
211. DEFENDANT, B.P. HYDE WHILE PROVIDING ACCESS TO MEDICAL CARE-N-SPECIALISTS SUCCESSFULLY TO ALL OTHER INMATES WHO SIGNED UP/SUBMITTED SICK CALL REQUEST, AND THOSE RECOMMENDED FOR SPECIALISTS, ESPECIALLY WHITE INMATES, BASED ON NON MEDICAL REASONS DEFENDANT, B.P. HYDE DENIED PLAINTIFF ACCESS TO MEDICAL CARE-N-SPECIALIST, DEFENDANT, B.P. HYDE ACTIONS VIOLATED RIGHTS TO EQUAL PROTECTION PER 14th AMENDMENT SEE: 21-27; 30; 33; 35-37, 29-33, 40-60; 66, 67; 70-71; 269

COUNT THREE: FREE SPEECH

212. PLAINTIFF ALLEGES AND INCORPORATES PARAGRAPHS 1 - 211
213. DEFENDANTS K, DELISMA, WILLIAM L. BOWERS, PHILLIP MAUST, HEIDI SROKA, ROBERT SNYDER, R. PESCHOCK, J. ADONE, ELLIS KAUFFMAN, RICHARD IRWIN, ROX-ANNE PLAYSO, LARENE DARLING, FETTERMAN, R. HUTCHINSON, D. TESTA, ERIC TICE, B. P. HYDE BY THREATENING PLAINTIFF WITH VIOLENCE, DENIAL MEDICAL CARE-N-EQUAL PROTECTION DUE TO PLAINTIFF EXERCISE OF PLAINTIFF RLUIPA RIGHTS; PRACTICE OF RELIGIOUS BELIEFS; RIGHT TO REDRESS THE PRISON THROUGH USE OF PRISON GRIEVANCE SYSTEM PASSIM 21-367
214. DEFENDANTS, WILLIAM L. BOWERS, PHILLIP MAUST, HEIDI SROKA, ROBERT SNYDER, ERIC TICE DENIED PLAINTIFF RLUIPA RIGHTS, AND RELIGIOUS PRACTICE, STILL ON GOING TO DATE! SEE 217-224, 228, 229, 236, 237, 240, 243, 244, 247-258; 31
215. IN A PRIOR SETTLEMENT AGREEMENT, WASHINGTON V. KLEM, THE DOC AGREED TO PROVIDE PLAINTIFF WITH ALL RELIGIOUS LITERATURE NEEDED TO CONDUCT COMPLAINT: W V. D

THE DAILY RITUALS OF PLAINTIFF RELIGIOUS BELIEFS.

216. PLAINTIFF IS FOUNDER AND LEADER OF THE CHILDREN OF THE SUN CHURCH, THEIR BELIEFS DICTATES A DAILY READING OF FOUR DIFFERENT SPIRITUALLY INSPIRED AFROKENTRIK BOOKS OR LITERATURE ON A DAILY BASIS. TO DATE! DEFENDANTS, P. MAUST, W. L. BOWERS-N-E, TICE, (CHAPLAIN, A BLOCK UNIT MANAGER-N-WARDEN) ARE CONTINUING TO DENY PLAINTIFF HIS RELIGIOUS BOOKS-N- LITERATURE NEEDED TO PERFORM THE FOREMENTION DAILY RITUALS. ^{SEE: 217-244, 248-258; 271, 272, 344, 349, 351, 355, 356, 357, 373, 374, 376}

217. DEFENDANTS, P. MAUST-CHAPLAIN, W. L. BOWERS-A BLOCK UNIT MANAGER, AND E. TICE-WARDEN CONTINUE TO DENY PLAINTIFF ACCESS TO PLAINTIFF RELIGIOUS LITERATURE, STILL ON GOING TO DATE! BASED ON NON PENOLOGICAL REASONS, I.E. RACE, RETALIATION, RELIGIOUS BELIEFS, PENALTY FOR COMMUNICATIONS WITH AUTHORITIES ^{SEE: 349, 355, 340, 341}

218. DEFENDANT, P. MAUST, ON GOING TO DATE! BASED ON NON PENOLOGICAL REASONS, I.E. RACE, RETALIATION, RELIGIOUS BELIEFS, PENALTY FOR COMMUNICATIONS WITH AUTHORITIES.

219. DEFENDANT, W. L. BOWER, UNIT MANAGER, STILL ON GOING TO DATE! BASED ON NON PENOLOGICAL REASONS, I.E. RACE, RETALIATION, RELIGIOUS BELIEFS, PENALTY FOR COMMUNICATIONS WITH AUTHORITIES ^{SEE: 364, 367, 365}

220. DEFENDANT, E. TICE, WARDEN, STILL ON GOING TO DATE! BASED ON NON PENOLOGICAL REASONS, I.E. RACE, RETALIATION, RELIGIOUS BELIEFS, PENALTY FOR COMMUNICATIONS WITH AUTHORITIES.

221. DESPITE RLUIPA MANDATE TO ENFORCE THE LEAST RESTRICTIVE MEANS CONCERNING PROVIDING PLAINTIFF RELIGIOUS NEEDS. DEFENDANTS, W. L. BOWERS, P. MAUST, N-E. TICE REPEATEDLY DENIED PLAINTIFF ACCESS TO PLAINTIFF OWN RELIGIOUS LITERATURE ^{SEE: 31}

N.B. DEFENDANTS, BOWERS, MAUST-N-TICE ARE STILL DOING SO TO DATE! WHICH ~~MAKES~~ STILL CONTINUES TO MAKE IT IMPOSSIBLE FOR PLAINTIFF TO PRACTICE HIS RELIGIOUS BELIEFS ^{SEE: 31}

222. DEFENDANTS, E. TICE, W. L. BOWERS-N-P. MAUST OPENLY PROFESSED SEVERAL TIMES THAT PLAINTIFF HAVING SUED SCI-BRENE DOC STAFF OR MEDICAL PROFESSIONALS; SCI-SOMERSET DOC STAFF-N-MEDICAL PROFESSIONALS; OR THEIR FAMILY MEMBERS; AND BRIEVANCES FILED AGAINST DEFENDANTS, TICE, BOWERS-N-MAUST; AND PLAINTIFF CONTINUOUS COMMUNICATIONS WITH AUTHORITIES IS WHY DEFENDANTS, TICE, BOWERS-N-MAUST DENIED, AND CONTINUE TO DATE! TO DENY PLAINTIFF TO PRACTICE HIS RELIGIOUS BELIEFS ^{SEE: 217, 340-374, 364, 369, 31}

223. PLAINTIFF, THE FOUNDER-N-LEADER OF THE "CHILDREN OF THE SUN" CHURCH WHO'S BELIEFS MANDATES THAT PLAINTIFF READ FROM FOUR DIFFERENT BOOKS PER DAY BY FOUR DIFFERENT AUTHORS THAN THOSE PLAINTIFF HAS READ WITHIN THE PAST FOUR DAYS; DEFENDANTS, P. MAUST, E. TICE-N-W. L. BOWERS BRAGGED-N-BOASTED ABOUT DEPRIVING PLAINTIFF ACCESS TO PLAINTIFF AFROKENTRIK LITERATURE CAUSING IT TO BE IMPOSSIBLE FOR PLAINTIFF TO PRACTICE THE "DAILY" RITUAL OF PLAINTIFF RELIGIOUS BELIEFS ^{SEE: 237, 242, 250, 271, 272, 281, 252-254, 341, 349, 355, 356}

224. DEFENDANTS, BOWERS, MAUST-N-TICE, DECLARED, "THERE'S NOTHING ABOUT AFRIKANS TO WORSHIP," "AFRIKA HAS NO GOD," "CHILDREN OF THE SUN" WHO THE HELL ARE THEY" "THE CHILDREN OF THE SUN CHURCH" FOUNDER-N-FOLLOWERS ARE UNDESERVING TO BE GRANTED ACCESS TO THEIR RELIGIOUS LITERATURE," "CHILDREN OF THE SUN CHURCH" IS NOT RELIGION," WHILE PROVIDING ACCESS TO RELIGIOUS LITERATURE TO ALL OTHER INMATES ON THE POD, ESPECIALLY WHITE INMATES AND OR NON CHILDREN OF THE SUN CHURCH

COMPLAINT: W. V. D.

BELIEVERS; DEFENDANTS, BOWERS, MAUST-N-ITSELF CONTINUES TO DENY PLAINTIFF ACCESS TO PLAINTIFF RELIGIOUS LITERATURE BASED ON NON PENOLOGICAL REASONS, I.E. RACE, RETALIATION, RELIGIOUS BELIEFS, PENALTY FOR COMMUNICATIONS WITH AUTHORITIES, WHILE PROVIDING IT OTHERS, ESPECIALLY WHITES. SEE: 21, 40, 27, 250-254, 271, 272, 340-342, 349, 355, 356, 369, 376

225. ANGERED BY PLAINTIFF HAVING SUED THEM PERSONALLY, I.E. DEFENDANTS, WIL BOWERS, P. MAUST, REQUEST TO STAFF, AND FILED GRIEVANCES, ON OR NEAR 1.9.18; 4.9.18; 9.10.19; DEFENDANT, BOWERS DENIED PLAINTIFF POSSESSION OF HIS RELIGIOUS LITERATURE WHICH MADE IT IMPOSSIBLE FOR PLAINTIFF TO PRACTICE HIS RELIGIOUS BELIEFS TO DATE! WHEREBY DEFENDANT, BOWERS NON COMPLIANCE TO RLUIPA MANDATE OF THE LEAST RESTRICTIVE MEANS. SEE: 238, 239, 226-229, 183, 217, 221-224, 236, 244, 255-258, 340-342, 351, 355, 369, 376, 27

226. ON OR NEAR 8.2.17; DEFENDANT, P. MAUST, CHAPLAIN, ACCESS TO RELIGIOUS LITERATURE, DEFENDANT, MAUST DENIED PLAINTIFF RELIGIOUS LITERATURE NEEDED TO PRACTICE PLAINTIFF RELIGIOUS BELIEFS; SMOKE TO PLAINTIFF IN GESTURE OF CONTEMPT-N-AS IF HAVING A WANT TO PHYSICALLY STRIKE PLAINTIFF, USING WORDS LADEN-N WITH RACIST-OVERTONES CAUSING PLAINTIFF TO FEAR FOR HIS LIFE. SEE: 183, 21, 173-176, 218, 227-229, 255-258, 351, 369;

227. ON OR NEAR 8.2.17, CONTINUING TO DATE! SAME EVENT, DEFENDANT, MAUST DENIAL OF PLAINTIFF RELIGIOUS LITERATURE FOR THE PAST 760 PLUS STRAIGHT DAYS TO DATE! DEFENDANT, MAUST CONTINUOUSLY CAUSE PLAINTIFF THE INABILITY TO PRACTICE HIS DAILY RELIGIOUS BELIEFS, DEFENDANT, MAUST ACTIONS VIOLATED PLAINTIFF FREE SPEECH OF RELIGION, AND RIGHTS TO THE LEAST RESTRICTIVE MEANS; BASED ON NON PENOLOGICAL INTEREST PER RLUIPA. 42 USC 2000cc 1-5; 18 USC 1382 247; FIRST AMENDMENT. SEE: 251, 369, 229

228. ON OR NEAR 8.2.17 ONGOING TO DATE! SAME EVENT, DEFENDANT, MAUST NON COMPLIANCE TO RLUIPA, WHICH MANDATES THE LEAST RESTRICTIVE MEANS; BASED ON NON PENOLOGICAL REASONS I.E. RACE, RETALIATIONS, RELIGIOUS BELIEFS, PENALTY FOR COMMUNICATIONS WITH AUTHORITIES, DENIED PLAINTIFF 760 PLUS STRAIGHT DAYS ONGOING TO DATE! OF "DAILY" RELIGIOUS PRACTICE, DEFENDANT, MAUST ACTIONS CONSTITUTES FREE SPEECH-N-RLUIPA UNDER 42 USC 2000cc 1-5; 18 USC 1382 247; FIRST AMENDMENT. SEE: 21, 172-176, 251, 369

229. ANGERED BY PLAINTIFF HAVING SUBMITTED REQUEST TO STAFF, AND FILED A GRIEVANCE AGAINST DEFENDANT, MAUST PERSONALLY, DEFENDANT, MAUST CONTINUE TO DENY PLAINTIFF RELIGIOUS LITERATURE, WHICH MAKES IT IMPOSSIBLE FOR PLAINTIFF TO PRACTICE HIS RELIGIOUS BELIEFS TO DATE! WHEREBY DEFENDANT, MAUST NON COMPLIANCE TO RLUIPA MANDATE OF THE LEAST RESTRICTIVE MEANS, DEFENDANT, MAUST ACTIONS CONSTITUTE RELIGIOUS FREE SPEECH-N-RLUIPA VIOLATIONS PER 42 USC 2000cc 1-5; 18 USC 1382 247; 1st AMEND.

230. ON OR NEAR 12.3.08, WHILE HOUSED IN HUNTINGTON RHU, HAVING FOUR BOXES OF RELIGIOUS-N-LEGAL PROPERTY IN PLAINTIFF CELL, AND SEVEN BOXES OF RELIGIOUS-N-LEGAL PROPERTY STORED IN SC-HUNTINGTON RHU PROPERTY ROOM. PLAINTIFF AND DOC ENJOINED IN THE WASHINGTON V. KLEW SETTLEMENT AGREEMENT, WHERE PLAINTIFF AND DOC DRAFTED THESE WORDS INTO THE SETTLEMENT N.B. "MR. WASHINGTON MAY RETAIN ONE FOOT LOCKER AND THREE OF HIS SEVEN RECORD-CENTER BOXES IN HIS CELL WHILE HE IS HOUSED IN THE GENERAL POPULATION"

231. SAME EVENT, 12.3.08, TO ENSURE THAT PLAINTIFF WOULD HAVE NINE BOXES COMPLAINT: W V. D

OF PROPERTY WHEN PLAINTIFF WAS RELEASSED FROM THE RHM, TO COMPENSATE WHAT PLAINTIFF-N-DOR HAD ALREADY AGREED TO, i.e. MR. WASHINGTON WILL BE PERMITTED TO POSSESS THE NINE STORAGE BOXES OR EQUIVALENT, IN LIGHT OF SCI-HUNTINGDON WANTING TO WITHHOLD FIVE BOXES OF PLAINTIFF PROPERTY BECAUSE PLAINTIFF ALREADY HAD FOUR BOXES INSIDE OF PLAINTIFF CELL, LEAVING TWO IN THE PROPERTY ROOM

232. ALL OF THE DICTATES OF THE WASHINGTON V. KLEM SETTLEMENT AGREEMENT WAS FULLY ENFORCED BY STAFF, INCLUDING SCI-SOMERSET RHM STAFF FOR 99-STRAIGHT MONTHS AT THAT TIME; THEN BASED ON NON PENOLOGICAL INTEREST, i.e. RACE, RELIGIOUS BELIEFS, COMMUNICATIONS WITH AUTHORITIES; PLAINTIFF WOULD NOT SIGN OFF ON BRIEVANCES, DEFENDANTS, P. MAUST, W. L. BOWERS, E. TICE, R. SNYDER, H. SROKA DISREGARDED-N-RE-INTERPRETED THE SETTLEMENT AGREEMENT FOR THE SAKE OF DENYING PLAINTIFF HIS RELIGIOUS-N-LEGAL PROPERTY ALREADY APPROVED BY THE SOMERSET ADMINISTRATION, THE WASHINGTON V. KLEM SETTLEMENT AGREEMENT, WHICH MANDATES THE ENFORCEMENT OF THE LEAST RESTRICTIVE MEANS ^{SEE: 225, 234-236, 248, 215, 227, 31;}

233. BECAUSE THE WASHINGTON V. KLEM SETTLEMENT AGREEMENT ONLY DICTATES THAT IF PLAINTIFF NEED TO POSSESS INSIDE OF HIS CELL MORE THAN THE AMOUNT OF PROPERTY ALLOWED BY THE AGREEMENT BECAUSE OF LITIGATION, HE MAY PETITION THE SUPERINTENDENT FOR PERMISSION TO POSSESS EXCESS PROPERTY INSIDE OF HIS CELL

234. NO. B. FOR 18 STRAIGHT MONTHS SCI-SOMERSET WAS IN COMPLIANCE WITH THE WASHINGTON V. KLEM SETTLEMENT, AND ONLY AFTER/WHEN PLAINTIFF DID NOT SIGN OFF ON BRN # 659236, WHICH PLAINTIFF FILED AGAINST SCI-SOMERSET STAFF; DID DEFENDANTS, DECLARE THEY WERE DISREGARDING THE DICTATES OF WASHINGTON V. KLEM SETTLEMENT, PP. 7-8; IN ACCORD WITH THE OTHER PRISONS FOR THE PAST ~~87~~ STRAIGHT MONTHS AS OF 7.14.15, i.e. THE LEAST RESTRICTIVE MEANS; AND SCI-SOMERSET APPROVAL FOR PLAINTIFF TO POSSESS EXCESS PROPERTY ^{SEE: 232, 355, 273, 215, 227, 236}

235. ON OR NEAR 7.14.15, PLAINTIFF ARRIVED AT SCI-SOMERSET WITH 16 BOXES OF RELIGIOUS-N-LEGAL LITERATURE, WHAT FOLLOWED WAS SCI-SOMERSET ADMINISTRATION IMMEDIATELY ARRIVED PLAINTIFF POSSESSION OF EXCESS PROPERTY; NINE BOXES INSIDE PLAINTIFF CELL, AND ALL OVERFLOW REMAINED STORED IN R-N-D, SCI-SOMERSET ADMINISTRATION'S RULING WAS BASED ON THE DICTATES OF WASHINGTON V. KLEM SETTLEMENT, PP. 5, 7-8; IN ACCORD WITH OTHER PRISONS FOR THE PAST 87-STRAIGHT MONTHS, AS OF 7.14.15, i.e. THE LEAST RESTRICTIVE MEANS

236. SCI-SOMERSET SUCCESSFULLY COMPLIED WITH THE DICTATES OF THE WASHINGTON V. KLEM SETTLEMENT FOR 18 STRAIGHT MONTHS; ACCORDING TO DEFENDANTS, W. BOWERS, P. MAUST, R. SNYDER, HEIDI SROKA-N-E. TICE, BECAUSE PLAINTIFF DID NOT SIGN OFF ON BRN # 659236, THE DICTATES OF WASHINGTON V. KLEM SETTLEMENT AGREEMENT, AND SCI-SOMERSET ADMINISTRATION APPROVAL TO POSSESS EXCESS PROPERTY, THE LEAST RESTRICTIVE MEANS ON GOING TO DATE! ARE DISCARDED ^{SEE: 225, 227, 215, 228-229, 31;}

237. DEFENDANTS, H. SROKA, R. SNYDER, P. MAUST, W. BOWERS-N-E. TICE, USED, AND CONTINUE TO DATE! TO USE THE MOST RESTRICTIVE MEANS TO DENY PLAINTIFF HIS RELIGIOUS COMPLAINT: W V. D

238. WITHOUT THE RELIGIOUS LITERATURE PLAINTIFF CANNOT PRACTICE HIS RELIGIOUS BELIEFS
I.E. READING FROM FOUR DIFFERENT BOOKS BY FOUR DIFFERENT AUTHORS THAN PLAINTIFF
READ WITHIN THE PAST FOUR DAYS CONCERNING SUBJECT MATTERS, EVENTS, KINGDOMS,
EMPIRES, PERSONALITIES, ETC. THAN THOSE READ ABOUT IN THE PAST FOUR DAYS; PLAINT-
IFF NEEDS TO PRAY OVER THE RELIGIOUS LITERATURE BEFORE AND AFTER READING; AND
WHEN ALLOWED THE LITERATURE IS SET THE RISING SUN PRIOR TO READING

239. PLAINTIFF RELIGIOUS LITERATURE-N-THE ~~REWARD~~ RITUAL ARE ONE-N-THE SAME

240. DEFENDANTS, R. SNYDER, H. SROKA, W. BOWERS, E. TICE-N-A MAUST DENIAL OF THE LEAST
RESTRICTIVE MEANS IS A VIOLATION OF RLUIPA, 42 USC 2000 CC, 1-5; 18 USC 1371 247; FIRST
AMENDMENT, WHICH TO DATE! HAS CONTINUED TO PLACE A BURDEN ON PLAINTIFF RE-
LIGIOUS BELIEFS; EVEN IF THE BURDEN RESULTS FROM A RULE OF GENERAL APPLICABILITY
241. 42 USC 2000 CC-3; MANDATES THE ACT SHALL BE CONSTRUED IN FAVOR OF A BROAD PRO-
TECTION OF RELIGIOUS EXERCISE, TO THE MAXIMUM EXTENT PERMITTED BY THE ~~TERMS~~
TERMS OF THIS ACT AND CONSTITUTION

242. PLAINTIFF, FOUNDER AND LEADER OF THE CHILDREN OF THE SUN CHURCH, WHERE
BOOKS ARE NEEDED TO FULFILL PLAINTIFF MISSIONARY WORK

243. DEFENDANT, P. MAUST, W. BOWERS, TICE, E.; R. SNYDER, R. AND H. SROKER ACTIONS IN-
FLICTED IRREPARABLE HARM TO PLAINTIFF WHEREIN PLAINTIFF TO DATE! CONTINUES
TO SUFFER ON BEING LOSS OF REWARDS IN THE AFTERLIFE. SEE 237, 341, 369

244. DEFENDANTS, K. DELISMA, WILLIAM BOWERS, PHILLIP MAUST, HEIDI SROKA, ROBERT
SNYDER, R. PESCHOCK, J. BIRONE, ELLIS KAUFFMAN, RICHARD IRWIN, ROXANNE PLAYSO,
LARENE DONNELLY, FETTERMAN, R. HUTCHINSON, D. TESTA, E. TICE, B. P. HYDE, SAME
SERIES OF EVENTS, CONCERNING THE SAME LAWS, RETALIATIONS AGAINST PLAINT-
IFF UNLAWFULLY, IN VIOLATIONS OF PLAINTIFF RIGHTS UNDER FIRST AMENDMENT, THE
ALLEGED ACTS ARE ALLEGED TO HAVE CAUSED PLAINTIFF INJURY TO PLAINTIFF FIRST
AMENDMENT-N-RLUIPA RIGHTS SEE 131

245. DEFENDANT, H. SROKA, WARDEN'S ASSISTANT-N-BRIEVANCE COORDINATOR, BY WITH-
ESSING-N-BEING ACUTELY AWARE OF THE MISCONDUCT OF DEFENDANTS WILLIAM BOW-
ERS, P. MAUST, R. SNYDER, RICHARD IRWIN, R. PLAYSO, R. HUTCHINSON, B. P. HYDE, AND
BY DEFENDANT, SROKA FAILING TO CORRECT THAT MISCONDUCT; AND ENCOURAGED THE CAN-
TINUATION OF THAT MISCONDUCT DEFENDANT, SROKA IS ALSO VIOLATIONS OF PLAINTIFF RIGHTS
UNDER FIRST AMENDMENT, THE ALLEGED ACTS ARE ALLEGED TO HAVE CAUSED PLAINTIFF IN-
JURY TO PLAINTIFF FREE SPEECH-N-RLUIPA GUARANTEED 42 USC 2000 CC 1-5; 18 USC 1371
247; FIRST AMENDMENT SEE 131, 2740, 340, 341, 342, 31

246. DEFENDANT, H. SROKA, BRIEVANCE COORDINATOR, REGULARLY-N-CONSISTENTLY REFUS-
ED TO RESPOND TO PLAINTIFF TIMELY SUBMITTED BRIEVANCE THAT REQUESTED RELIEF OF
MONETARY DAMAGES-N-REQUEST TO STAFF; HINDERED, STYMIED, PREVENTED-N-DENIED
PLAINTIFF THE EXERCISE OF HIS RIGHTS TO SEEK REDRESS FROM DEFENDANTS THROUGH USE OF THE IN-
MATE GRIEVANCE SYSTEM: DC-ADM 804 POLICY; DEFENDANT, SROKA ACTIONS UNLAWFULLY IN
COMPLAINT: WV. D

VIOLATION OF PLAINTIFF FIRST AMENDMENT RIGHT OF FREE SPEECH, OF THE ILLEGAL ACT-
IONS CAUSED PLAINTIFF INJURY TO PLAINTIFF FREE SPEECH GUARANTEED UNDER THE FIRST
AMENDMENT, AND CONSTITUTED RETALIATION SEE 174-175; 31

247. ON OR NEAR 10.14.15; 2.10.16; 8.22.16; DURING CONFIDENTIAL INTERVIEWS DEFEND-
ANT, H. SROKA, DECLARED WHEN PLAINTIFF REQUESTED WHY DEFENDANT, SROKA WAS NOT RE-
SPONDING TO HIS MANY TIMELY SUBMITTED GRIEVANCES, SPEAKING AS IF SHE WAS SCOLDING
PLAINTIFF, "ABSOLUTELY NO FAULTS NOR SHORT COMINGS WERE DISCOVERED IN ANY OF THE ORI-
GINAL GRIEVANCES PLAINTIFF FILED; OTHERWISE SHE WOULD HAVE REJECTED EACH-N-EVERY
ONE OF THEM," PLAINTIFF ASKED WHY DIDNT SHE RESPOND TO ANY OF THE GRIEVANCES WHERE
PLAINTIFF REQUESTED MONETARY RELIEF. DEFENDANT, SROKA, DECLARED, "THERE WAS NO
NEED FOR PLAINTIFF TO MAKE SUCH-A REQUEST," "BY PLAINTIFF DOING SO ONLY CREATES AN-
TIMOSITY BETWEEN STAFF AND INMATE," AND "IN THE FUTURE SHE WOULD NOT RESPOND TO EVERY
GRIEVANCE REQUESTING MONETARY RELIEF," NON OF PLAINTIFF REQUEST TO HER CONCERN-
ING HER NOT RESPONDING TO PLAINTIFF GRIEVANCES SEE: 40; 41; 39; 74; 215; 232-236; 245; 340; 349;
364; 31

248. SAME ISSUE, ON ~~OR NEAR~~ OR NEAR 11.7.18; 12.19.18; 7.19.
19; DEFENDANT, E. TICE, WARDEN, WHEN PLAINTIFF MADE HIM AWARE THAT ~~PLAINTIFF~~
PLAINTIFF WAS BEING DENIED THE LEAST RESTRICTIVE MEANS, DEFENDANT, TICE
OPENLY PROFESSED WASHINGTON V. KLEW, SETTLEMENT AGREEMENT ONLY SAYS THAT ON
PAPER, THAT JUDGE RUNS HIS COURT, BUT HE (DEFENDANT, TICE) RUNS THE PRISON, BECAUSE NO
JUDGE ^{CAN} EVER GIVE A BLACK MAN RIGHTS A WHITE MAN WILL RESPECT, AND HE WAS
NOT ABOUT ^{TO} COMPLY TO WASHINGTON V. KLEW, SETTLEMENT, WHICH MANDATES THE EN-
FORCEMENT OF THE LEAST RESTRICTIVE MEANS, SEE: 41; 59; 35; 40; 74; 215-225; 31

249. ON OR NEAR 11.7.18; 12.19.18; 7.19.19; SAME ISSUES, DEFENDANT, E. TICE, DECL-
ARE HE WAS AWARE OF THE DICTATES OF WASHINGTON V. KLEW, SETTLEMENT, PP. 5, 7-8, WH-
ICH PROVIDES PLAINTIFF IS ALLOWED EXCESS PERSONAL PROPERTY. ACCORDING TO DEFEND-
ANT, TICE, HE WAS PENALIZING PLAINTIFF FOR ALWAYS FILING GRIEVANCES, BEING DIS-
RESPECTFUL IN REFUSING TO SIGN OFF ON A GRIEVANCE, PLAINTIFF RELIGIOUS BELIEFS, RACE, AND
ON BEING COMMUNICATION ^{WITH} ~~THE~~ AUTHORITIES i.e. BASED ON NON PENOLOGICAL REASONS, DE-
FENDANT ACTIONS CONSTITUTED FREE SPEECH-N-RLUZA VIOLATIONS UNDER 42 USC 2000c,
1-5; 18 USC 1333 247; FIRST AMENDMENT SEE: 41; 59; 40; 35; 74; 215-225; 31

250. ON OR NEAR 1.9.18, RELIGIOUS LITERATURE, DEFENDANT, W. L. BOWERS, UNIT MANAGER
DENIAL OF THE LEAST RESTRICTIVE MEANS HAS MADE THE DAILY PRACTICE OF PLAINTIFF
RELIGIOUS BELIEFS IMPOSSIBLE, PLAINTIFF RELIGION AND RELIGIOUS LITERATURE ARE ONE
AND THE SAME, THEREFORE, DEFENDANT, BOWERS DENIED PLAINTIFF POSSESSION OF HIS
RELIGIOUS LITERATURE, DEFENDANT, BOWERS ALSO DENIED PLAINTIFF THE "DAILY" PRACT-
ICE OF HIS RELIGIOUS BELIEFS SEE: 41; 59; 39; 40; 74; 215-225

251. SAME EVENT, DEFENDANT, BOWERS DENIAL OF THE LEAST RESTRICTIVE MEANS
DID NOT MERELY DENY PLAINTIFF ONE OR TWO DAYS TO PRACTICE HIS RELIGIOUS BELIEFS.
TO DATE! IT HAS BEEN MORE THAN 900 STRAIGHT DAY-N- STILL COUNTING, THIS
COULD HAVE EASILY BEEN AVOIDEN WITH COMPLIANCE OF THE LEAST RESTRICTIVE
MEANS, PER RLUIA. ACCORDING TO DEFENDANT, BOWERS, DENIAL OF RELIGIOUS

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- LITERATURE WAS DUE TO PLAINTIFF FILING BRIEF DEMANDING ACTION AGAINST NON-PENOLOGICAL INTEREST. DEFENDANT BOWERS ACTIONS CONSTITUTED FREE SPEECH-N-RELIGIOUS RIGHTS UNDER 42 USC 2000cc, 1-5; 18 USC 1331-1337, FIRST AMENDMENT SEE: 227, 269
252. ON OR NEAR 4.8.17, FAILURE TO ACT, DEFENDANT, R. SNYDER, CAPTAIN OF SECURITY, AIDED-N-ABETTED TWO WHITE INMATES TO SUCCESSFULLY STEAL-N-TRADE PLAINTIFF RELIGIOUS BOOKS FOR DRUGS. PLAINTIFF REPEATEDLY MADE DEFENDANT SNYDER AWARE SEVERAL TIMES OVER VIA CONFIDENTIAL INTERVIEWS-N-REQUEST TO STAFF DEFENDANT SNYDER FOR SEVERAL WEEKS RESPONDED "SURE, THE WHITE MAN STOLE YOUR RELIGIOUS BOOKS" "BLACKS ALWAYS CLAIM WHITES ROBBED THEM" SEE: 186, 272)
253. SAME EVENT, 4.8.17, DEFENDANT, R. SNYDER, HAVING BEEN MADE AWARE SEVERAL TIMES OVER DEFENDANT, SNYDER NOT ACTING FOR MORE THAN 30-DAYS ALLOWED THE TWO ALREADY IDENTIFIED WHITE MALES, WHO HAD ALREADY ADMITTED THEY STOLE PLAINTIFF BOOKS, TO HIDE PLAINTIFF BOOKS WITH THEIR FRIENDS, THE EXCHANGE THE BOOK FOR DRUGS.
254. SAME EVENT, 4.8.17, DEFENDANT, R. SNYDER RESPOND IMMEDIATE TO PROVIDE SAFETY-N-PROTECTION TO OTHER INMATES, ESPECIALLY WHITE INMATES, BASED ON NON PENOLOGICAL INTEREST, I.E. RACE, RELIGIOUS BELIEFS, NOT SIGNING OFF ON EVASION #059236; COMMUNICATIONS WITH AUTHORIZES. DEFENDANT, SNYDER DELAYED. THE LOSS OF RELIGIOUS BOOKS PLACED A BURDEN ON PLAINTIFF RELIGIOUS PRACTICE OF HIS RELIGIOUS BELIEFS, DEFENDANT, SNYDER ACTIONS-N-NON ACTION CONSTITUTED FREE SPEECH, RELIGIOUS-N-CRUEL AND UNUSAL PUNISHMENT VIOLATIONS-N-EQUAL PROTECTION VIOLATIONS PER 42 USC 2000cc, 1-5; 18 USC 1331-1337, FIRST-N-EIGHTH AMENDMENTS SEE: 251, 355, 364, 369, 374, 272
255. ON OR NEAR 8.5.17, CONTINUING TO DATE! RELIGIOUS LITERATURE, DEFENDANT, P. MAUST, CHAPLAIN PROVIDED ALL OTHER INMATES, ESPECIALLY WHITE INMATES, AND/OR NON CHILDREN OF THE SUN CHURCH BELIEVERS, WITH PRIVISIONS "FREE OF CHARGE" IRRESPECT OF THE AMOUNT OF RELIGIOUS LITERATURE CONCERNING THEIR RELIGIOUS BELIEFS. IRRESPECT OF AVAILABILITY IN THE MAIN LIBRARY, BASED ON NON RELIGIOUS INTEREST, DEFENDANT, MAUST DENIED PLAINTIFF REQUEST FOR RELIGIOUS LITERATURE READILY AVAILABLE, CONCERNING PLAINTIFF RELIGIOUS BELIEFS, I.E. PERTAINING TO AFRIKA-N-AFRIKAN PEOPLE SEE: 183, 215-245, 256-258, 364
256. 8.5.17, SAME EVENT, DEFENDANT, P. MAUST, DENIED PLAINTIFF A INDIGENT INMATE RELIGIOUS LITERATURE NOT IN THE MAIN LIBRARY, CONTINUING TO DATE! ACCORDING TO DEFENDANT, MAUST, BECAUSE THE RELIGIOUS LITERATURE PLAINTIFF REQUESTED CONCERNED FACTS ABOUT AFRIKA-N-AFRIKAN PEOPLE, IT IS NOT RELIGIOUS LITERATURE, THEREFORE, DEFENDANT, MAUST DECLARED HE DIDN'T HAVE TO PROVIDE PLAINTIFF WITH IT.
257. SAME EVENT, 8.5.17-CONTINUING TO DATE! DEFENDANT, P. MAUST DENIED PLAINTIFF RELIGIOUS LITERATURE WHICH DEFENDANT, MAUST HAS READILY AVAILABLE ACCESS TO AN INEXHAUSTIBLE RELIGIOUS LITERATURE SUPPLY, DEFENDANT, MAUST DID NOT USE THE LEAST RESTRICTIVE MEANS, DEFENDANT, MAUST DENIAL OF RELIGIOUS LITERATURE PLACED A BURDEN ON THE DAILY PRACTICE OF PLAINTIFF RELIGIOUS BELIEFS.

DEFENDANT, MAUST ACTIONS CONSTITUTED FREE SPEECH - N - RETALIATION PER 42 USC 2000cc, 1-5; 18 USC 1337, 247; FIRST AMENDMENT

258. SAME EVENT, 8.5.17 - ONGOING TO DATE! DEFENDANT, MAUST DECLARED IF PLAINTIFF HAD NOT SUED ALL SCI-GREENE COUNTY STAFF, REFUSED TO SIGN OFF ON GRN # 659236; AND CONTINUOUSLY COMMUNICATED WITH AUTHORITIES, DEFENDANT, MAUST WOULD PROVIDE PLAINTIFF WITH RELIGIOUS LITERATURE UPON REQUEST. DEFENDANT, MAUST ACTIONS CONSTITUTED FREE SPEECH - N - RLUIPA VIOLATIONS PER 42 USC 2000 cc, 1-5; 18 USC 1337, 247; FIRST AMENDMENT.

259. ON OR NEAR 11.27.18; 12.13.18; 2.8.19; 4.2.19; 5.30.19; 6.17.19; 8.1.19; 9.5.19; 10.2.19, SEE 130, 131, 164, 170, 52, 154, 270, 172-172; 174-176; 40: 340-342; 376; 47

DEFENDANT, K. DELISMA, DR. - N - MEDICAL DIRECTOR, SICK CALL, RATIONALE FOR HIS DELIBERATE INDIFFERENCE TO PLAINTIFF CHRONIC AILMENTS WAS THE PENALTY FOR PLAINTIFF HAVING FILED GRIEVANCE AGAINST DEFENDANT, DELISMA; PLAINTIFF HAVING SUE MEDICAL STAFF CURRENTLY UNDER HIS SUPERVISION; AND PLAINTIFF COMMUNICATIONS WITH AUTHORITIES. DEFENDANT, DELISMA ACTIONS CONSTITUTE FREE SPEECH CONSPIRACY - N - RETALIATION VIOLATIONS PER FIRST AMENDMENT; 42 USC 1985 SEE: 132, 135, 21-29, 33, 35, 39-41, 43-60, 62; 170-172, 363, 374

260. ON OR NEAR 1.15.18; SICK CALL; DEFENDANT, J. GIRONE, DOCTOR, PROFESSED PENALIZING PLAINTIFF FOR HAVING SUE MEMBERS OF SCI-SOMERSET MEDICAL STAFF, FILING GRIEVANCES, CONTINUOUS COMMUNICATIONS WITH AUTHORITIES, DEFENDANT, GIRONE ACTIONS VIOLATED PLAINTIFF FREE SPEECH RIGHT PER FIRST AMENDMENT; 42 USC 1985 SEE 114, 52, 193, 274, 351, 352, 338-342, 363, 364, 376, 27, 40

261. ON OR NEAR 4.3.18; 11.6.18; 11.20.18; 12.4.18; 2.4.19; 3.13.18; SICK CALL, DEFENDANT, E. KAUFFMAN, DOCTOR; RATIONALE WAS HE WAS PUNISHING PLAINTIFF FOR FILING A GRIEVANCE AGAINST HIM, AND LAWSUITS AGAINST DEFENDANT, KAUFFMAN, - N - COMMUNICATION WITH AUTHORITIES, EVEN DARED PLAINTIFF TO SUE DEFENDANT, KAUFFMAN, DEFENDANT, KAUFFMAN ACTIONS CONSTITUTED FREE SPEECH VIOLATION PER FIRST AMENDMENT; 42 USC 1985 SEE: 118, 52, 27, 40, 132, 195, 275, 172, 351, 352, 338-342, 363, 364, 376

262. ON OR NEAR 10.18.17 AND 2.19.19, EYE EXAM, DEFENDANT, R. IRWIN, OPTOMETRIST, RETALIATED, ACCORDING TO DEFENDANT, IRWIN, PLAINTIFF CONTINUOUSLY COMMUNICATION WITH AUTHORITIES WHICH INCLUDED COMPLAINING OF DEFENDANT, IRWIN, FILED A GRIEVANCE AGAINST DEFENDANT, IRWIN, HABITUALLY FILING GRIEVANCES - N - LAWSUITS AGAINST DEFENDANT, IRWIN CO-WORKER IN THE MEDICAL DEPARTMENT, CHALLENGED PLAINTIFF TO SUE DEFENDANT IRWIN. DEFENDANT, IRWIN ACTIONS CONSTITUTED FREE SPEECH RIGHT PER FIRST AMENDMENT; 42 USC 1985 SEE: 151, 52, 276

263. ON OR NEAR 12.24.18; 3.22.19, SICK CALL, R. PLAYSO, PACS, RETALIATION, STATED PLAINTIFF HAD SUE HER - 172, CONTINUE COMMUNICATIONS WITH AUTHORITIES, CONSTANTLY FILING GRIEVANCES AGAINST HER, AND FELLOW MEDICAL PROFESSIONALS. DEFENDANT PLAYSO ACTION CONSTITUTED FREE SPEECH VIOLATION PER FIRST AMENDMENT 42 USC 1985 SEE: 143, 153, 52, 21, 199, 271, 142, 338-343, 363, 364, 376

264. ON OR NEAR 7.2.18, SICK CALL, DEFENDANT, L. DANNENLY, CNP; DEFENDANT, DARLING DELIBERATE INDIFFERENCE WAS DUE, ACCORDING TO DEFENDANT, DARLING, PLAINTIFF COMPLAINT: W.V. A

- IFF HAVING SUED SCI-SOMERSET MEDICAL PROFESSIONALS, CONSTANTLY FILING GRIEVANCES, AND COMMUNICATIONS WITH AUTHORITIES, DEFENDANT, DARLING ACTIONS CONSTITUTE CONSPIRACY, FREE SPEECH VIOLATIONS AND RETALIATION PER FIRST AMENDMENT, 42 USC 1985 SEE: 122
245. ON OR NEAR 12.20.18; 12.24.18, SICK CALL; DEFENDANT, FETTERMAN, RETALIATION, ACCORDING TO DEFENDANT, FETTERMAN, CONTINUOUS COMMUNICATIONS WITH AUTHORITIES; HAVING SUED SCI-SOMERSET MEDICAL PROFESSIONALS, AND ALWAYS FILING GRIEVANCES, DEFENDANT, FETTERMAN ACTIONS CONSTITUTED RETALIATION-N-FREE SPEECH RIGHT PER FIRST AMENDMENT, 42 USC 1985 SEE: 140, 141, 144, 219, 240, 241-30; 39-41; 43-62; 68-71; 82; 338-343; 350-352; 354; 362-364; 366-368; 376; 200
246. ON OR NEAR 1.18.19, SICK CALL, DEFENDANT, R. HUTCHINSON, PAC.; RETALIATION ACCORDING TO DEFENDANT, HUTCHINSON, FOR PLAINTIFF CONTINUOUS COMMUNICATION WITH AUTHORITIES, FILED A GRIEVANCE AGAINST DEFENDANT, HUTCHINSON; HAVING SUED DEFENDANT, HUTCHINSON-N-SCI-SOMERSET MEDICAL PROFESSIONALS, DEFENDANT, HUTCHINSON ACTIONS CONSTITUTED RETALIATION-N-FREE SPEECH VIOLATION PER FIRST AMENDMENT, 42 USC 1985 SEE: 145, 52, 202, 204, 145, 21, 280, 338-343; 350-352; 354; 362-364; 366-368; 376; 21-30; 39-41; 43-62; 68-71; 82.
247. ON OR NEAR 3.22.19; 4.12.19; 6.17.19; SICK CALL; DEFENDANT, D. TESTA, PAC; RETALIATIONS BASED ON PLAINTIFF HAVING SUED SCI-SOMERSET MEDICAL PROFESSIONALS, CONSTANTLY FILING GRIEVANCE, AND CONTINUOUS COMMUNICATIONS WITH AUTHORITIES, DEFENDANT, TESTA ACTIONS CONSTITUTED RETALIATION-N-FREE SPEECH VIOLATION PER FIRST AMENDMENT, 42 USC 1985 SEE: 153, 158, 52, 166, 206, 281, 338-343; 350-352; 354; 362-364; 366-368; 376; 21-30; 39-41; 43-62; 68-71; 82
248. ON OR NEAR 11.7.18; 12.19.18; 7.19.19; CONFIDENTIAL INTERVIEW, DEFENDANT, E. TICE, WARDEN; FAILURE TO ACT, BASED ON PLAINTIFF HAVING SUED SCI-SOMERSET-N-SCI-GREENE DOC STAFF, AND MEDICAL PROFESSIONALS, PLAINTIFF COMPLAINEING ABOUT DEFENDANT, TICE THROUGH CONTINUOUS COMMUNICATIONS WITH AUTHORITIES, ALWAYS FILING GRIEVANCES-N-LAWS, DEFENDANT, TICE NON ACTION-N-ACTION CONSTITUTED RETALIATION-N-FREE SPEECH VIOLATIONS PER FIRST AMENDMENT, 42 USC 1985 SEE: 52, 127, 207, 21, 29, 126, 137, 138, 206, 209, 220-222, 282, 338-343; 350-352; 363; 364; 367; 376; 22-31; 140; 43-68; 70; 71; 31
249. ON OR NEAR 12.24.18; 1.17.19; 5.6.19-5.8.19; ACCESS TO MEDICAL CARE; DEFENDANT, B.P. HYDE, BASED, ACCORDING TO DEFENDANT, HYDE, HEALTH CARE ADMINISTRATOR, PLAINTIFF HAD SUED HIM-N-SCI-SOMERSET MEDICAL PROFESSIONALS, CONTINUELY FILING GRIEVANCES, AND COMMUNICATIONS WITH AUTHORITIES, DEFENDANT, HYDE ACTS CONSTITUTED RETALIATION-N-FREE SPEECH VIOLATIONS PER FIRST AMENDMENT, 42 USC 1985 SEE: 52, 141, 159-160; 142; 66; 36; 99; 147; 159-162; 169; 283; 338-343; 346; 350-354; 363; 364; 367; 375; 376; 31
270. ON OR NEAR 4.2.19; 5.30.19; 9.5.19, SICK CALL, DEFENDANT, K. DELISMA, MEDICAL, RATIONALE, TO PENALIZE PLAINTIFF FOR FILING A GRIEVANCE AGAINST DEFENDANT, SUING MEDICAL PROFESSIONALS UNDER DEFENDANT, DELISMA SUPERVISION, CONSTANTLY FILING GRIEVANCES-N-COMMUNICATIONS WITH AUTHORITIES, DEFENDANT, DELISMA ACTION CONSTITUTED RETALIATION-N-FREE SPEECH VIOLATION PER FIRST AMENDMENT, 42 USC 1985 SEE: 21, 87, 138; 151; 156; 22-60; 61; 259; 338-342; 350-354; 363; 364; 367; 368; 376
271. ON OR NEAR 9.10.19, ACCESS TO RELIGIOUS LITERATURE, DEFENDANT, UNIT MANAGER, W.L. BOWERS ACTION WAS BASED ON THE RATIONALE, PLAINTIFF HAD SUED HIM, ALWAYS FILED GRIEVANCES, AND COMMUNICATIONS WITH AUTHORITIES. DEFENDANT, W. COMPLAINT: W.V.D

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L, BOWERS ACTIONS CONSTITUTED RETALIATION-N-FREE SPEECH VIOLATIONS PER FIRST AMENDMENT; 42 USC 1985; SEE 52; 214, 216, 217, 219, 222, 223, 225, 232, 236, 237, 240, 243, 250, 251, 338-342, 349, 351, 355, 356, 363-365, 369, 374, 375, 376, 377, 378, 379, 380, 381, 382, 383, 384, 385, 386, 387, 388, 389, 390, 391, 392, 393, 394, 395, 396, 397, 398, 399, 400, 401, 402, 403, 404, 405, 406, 407, 408, 409, 410, 411, 412, 413, 414, 415, 416, 417, 418, 419, 420, 421, 422, 423, 424, 425, 426, 427, 428, 429, 430, 431, 432, 433, 434, 435, 436, 437, 438, 439, 440, 441, 442, 443, 444, 445, 446, 447, 448, 449, 450, 451, 452, 453, 454, 455, 456, 457, 458, 459, 460, 461, 462, 463, 464, 465, 466, 467, 468, 469, 470, 471, 472, 473, 474, 475, 476, 477, 478, 479, 480, 481, 482, 483, 484, 485, 486, 487, 488, 489, 490, 491, 492, 493, 494, 495, 496, 497, 498, 499, 500, 501, 502, 503, 504, 505, 506, 507, 508, 509, 510, 511, 512, 513, 514, 515, 516, 517, 518, 519, 520, 521, 522, 523, 524, 525, 526, 527, 528, 529, 530, 531, 532, 533, 534, 535, 536, 537, 538, 539, 540, 541, 542, 543, 544, 545, 546, 547, 548, 549, 550, 551, 552, 553, 554, 555, 556, 557, 558, 559, 560, 561, 562, 563, 564, 565, 566, 567, 568, 569, 570, 571, 572, 573, 574, 575, 576, 577, 578, 579, 580, 581, 582, 583, 584, 585, 586, 587, 588, 589, 590, 591, 592, 593, 594, 595, 596, 597, 598, 599, 600, 601, 602, 603, 604, 605, 606, 607, 608, 609, 610, 611, 612, 613, 614, 615, 616, 617, 618, 619, 620, 621, 622, 623, 624, 625, 626, 627, 628, 629, 630, 631, 632, 633, 634, 635, 636, 637, 638, 639, 640, 641, 642, 643, 644, 645, 646, 647, 648, 649, 650, 651, 652, 653, 654, 655, 656, 657, 658, 659, 660, 661, 662, 663, 664, 665, 666, 667, 668, 669, 670, 671, 672, 673, 674, 675, 676, 677, 678, 679, 680, 681, 682, 683, 684, 685, 686, 687, 688, 689, 690, 691, 692, 693, 694, 695, 696, 697, 698, 699, 700, 701, 702, 703, 704, 705, 706, 707, 708, 709, 710, 711, 712, 713, 714, 715, 716, 717, 718, 719, 720, 721, 722, 723, 724, 725, 726, 727, 728, 729, 730, 731, 732, 733, 734, 735, 736, 737, 738, 739, 740, 741, 742, 743, 744, 745, 746, 747, 748, 749, 750, 751, 752, 753, 754, 755, 756, 757, 758, 759, 760, 761, 762, 763, 764, 765, 766, 767, 768, 769, 770, 771, 772, 773, 774, 775, 776, 777, 778, 779, 780, 781, 782, 783, 784, 785, 786, 787, 788, 789, 790, 791, 792, 793, 794, 795, 796, 797, 798, 799, 800, 801, 802, 803, 804, 805, 806, 807, 808, 809, 810, 811, 812, 813, 814, 815, 816, 817, 818, 819, 820, 821, 822, 823, 824, 825, 826, 827, 828, 829, 830, 831, 832, 833, 834, 835, 836, 837, 838, 839, 840, 841, 842, 843, 844, 845, 846, 847, 848, 849, 850, 851, 852, 853, 854, 855, 856, 857, 858, 859, 860, 861, 862, 863, 864, 865, 866, 867, 868, 869, 870, 871, 872, 873, 874, 875, 876, 877, 878, 879, 880, 881, 882, 883, 884, 885, 886, 887, 888, 889, 890, 891, 892, 893, 894, 895, 896, 897, 898, 899, 900, 901, 902, 903, 904, 905, 906, 907, 908, 909, 910, 911, 912, 913, 914, 915, 916, 917, 918, 919, 920, 921, 922, 923, 924, 925, 926, 927, 928, 929, 930, 931, 932, 933, 934, 935, 936, 937, 938, 939, 940, 941, 942, 943, 944, 945, 946, 947, 948, 949, 950, 951, 952, 953, 954, 955, 956, 957, 958, 959, 960, 961, 962, 963, 964, 965, 966, 967, 968, 969, 970, 971, 972, 973, 974, 975, 976, 977, 978, 979, 980, 981, 982, 983, 984, 985, 986, 987, 988, 989, 990, 991, 992, 993, 994, 995, 996, 997, 998, 999, 1000.

272. ON OR NEAR 4.8.17; FAILURE TO ACT; DEFENDANT, R. SNYDER, SECURITY CAPT. RATIONALE THAT PLAINTIFF HAD SUED SEC-BRENE DOC STAFF-N-MEDICAL PROFESSIONALS, CONTINUALLY FILING GRIEVANCES AND COMMUNICATIONS WITH AUTHORITIES, DEFENDANT, SNYDER ACTIONS CONSTITUTED RETALIATION-N-FREE SPEECH VIOLATIONS PER FIRST AMENDMENT; 42 USC 1985; SEE 52; 252-254, 185, 186, 332, 236, 338-342, 349, 351, 355, 356, 363, 364, 369, 374, 376

273. BEGINNING ON OR NEAR 4.11.8 - STILL ONGOING, SPATS OFFCATING, DEFENDANT, R. PESCHOCK, ACTIVITIES SPECIALIST, TO DATE! CONTINUE ABUSE PLAINTIFF FOR HAVING SUED HER, FILLED A GRIEVANCE AGAINST DEFENDANT, PESCHOCK, AND COMMUNICATING WITH AUTHORITIES, DEFENDANT, PESCHOCK ACTIONS CONSTITUTED RETALIATION-N-FREE SPEECH VIOLATION PER FIRST AMENDMENT; 42 USC 1985 SEE 52, 187, 191, 338-342, 351, 358-364, 376

274. ON OR NEAR 1.15.18; SICK CALL, DEFENDANT, J. BIRONE, DOCTOR; RATIONALE FOR HIS MISCONDUCT, PLAINTIFF SUED DEFENDANT, BIRONE CO-WORKERS, CONSTANTLY FILED GRIEVANCES AND COMMUNICATED WITH AUTHORITIES, DEFENDANT, BIRONE ACTIONS CONSTITUTED RETALIATION-N-FREE SPEECH VIOLATIONS; 1st AMENDMENT; 42 USC 1985; SEE 52, 114, 115, 260

275. ON OR NEAR 4.3.18, 3.13.18, 12.4.18, 2.4.19; SICK CALL, DEFENDANT, E. KAUFFMAN, PACS, EACH OCCASION, DEFENDANT, KAUFFMAN PROFESSED A DENIAL OF MEDICAL CARE BECAUSE PLAINTIFF SUED HIM, SUED HIS COWORKERS, ALWAYS FILED GRIEVANCES-N-COMMUNICATIONS WITH AUTHORITIES, DEFENDANT, KAUFFMAN ACTIONS CONSTITUTED RETALIATION-N-FREE SPEECH VIOLATIONS PER FIRST AMENDMENT; 42 USC 1985 SEE 52, 118-120, 196, 132, 26, 338-342, 350-352, 354, 363, 364-369, 375, 376, 21-30, 35-37, 39-41, 43-46, 338-342, 352, 353, 354, 363-369, 375-376

276. ON OR NEAR 12.18.17; EYE EXAMINATION, DEFENDANT, R. IRWIN, OPTOMETRIST, DELIBERATE INDIFFERENCE TO PLAINTIFF WEARING DARK SUNGLASSES, RIGHT EYE DISCHARGING PUS-N-BLOOD, DEFENDANT, IRWIN RESPONDED TO PLAINTIFF REPEATED REQUEST TO BE SEEN BY OPHTHALMOLOGIST, DEFENDANT, IRWIN APPEARED ANGRY WITH PLAINTIFF, DECLARED TO PLAINTIFF "YOU SUR HAVE AN AWFUL TO TELL AUTHORITIES, KEEP MY NAME OUT OF YOUR GRIEVANCES", ON OR NEAR 9.27.17, 10.18.17, 2.19.19; ALL THREE OCCASIONS, EYE EXAMINED; DEFENDANT, R. IRWIN DENIED PLAINTIFF, ACCORDING TO DEFENDANT, IRWIN, TO PENALIZE PLAINTIFF FOR SUING HIM, FILING GRIEVANCE AGAINST DEFENDANT, IRWIN, PLAINTIFF HAD SUED DEFENDANT, IRWIN CO-WORKER, ALWAYS FILED GRIEVANCE-N-COMMUNICATED WITH AUTHORITIES, DEFENDANT, IRWIN CONSTITUTED CRUEL-N-UNUSUAL PUNISHMENT, RETALIATION-N-FREE SPEECH VIOLATIONS UNDER 1st, 8th AND 14th AMENDMENT; 42 USC 1985 SEE 52, 196, 197, 151, 262, 338-342, 350-352, 354, 364-369, 363, 375, 376, 40, 21, 54

277. ON OR NEAR 12.24.18, 3.22.19, SICK CALL, DEFENDANT, R. PLAYSO, PAC; ENCOURAGED CO-WORKERS-N-ACTED IN CONCERT TO DENY PLAINTIFF MEDICAL CARE TO PENALIZE PLAINTIFF FOR SUING DEFENDANT, PLAYSO, FILING GRIEVANCES AGAINST DEFENDANT, PLAYSO; SUING SEC-SOMERSOMET MEDICAL PROFESSIONALS, ALWAYS FILING GRIEVANCES-N-COMMUNICATIONS WITH AUTHORITIES, DEFENDANT, PLAYSO ACTIONS CONSTITUTED RETALIATION, CONSPIRACY-N-FREE SPEECH VIOLATIONS PER 1st AMENDMENT; 42 USC 1985; SEE 52, 198, 199, 141, 153, 143, 263, 54, 40, 338-342, 350-352, 354, 21, 34, 363-369, 375, 376

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278. ON OR NEAR 7, 8, 10, SICK CALL, DEFENDANT, LIDGWAY, CRNP, ACTED IN CON-
CERT TO PENALIZE PLAINTIFF FOR SUING SCI-SOMERSET MEDICAL PROFESSIONALS, DEFEND-
ANT DARLING COWORKER, AND PLAINTIFF CONTINUOUSLY FILING GRIEVANCES, AND COM-
MUNICATIONS WITH AUTHORITIES, DEFENDANT, DARLING ACTIONS CONSTITUTES RE-
TALIATION CONSPIRACY-N-FREE SPEECH VIOLATIONS PER FIRST AMENDMENT, 42 USC
1985 SEE: 52, 122, 264, 21, 27, 42-51, 56-60, 200, 39, 40, 22-26, 40, 338-342, 350, 352, 355-359,
375, 376, 54
279. ON OR NEAR 12, 20, 18; 12, 24, 18; SICK CALL; DEFENDANT, FETTERMAN, CRNP, ACTED
IN CONCERT TO PENALIZE PLAINTIFF FOR HAVING SUED DEFENDANT, FETTERMAN COWORK-
ERS, I.E. SCI-SOMERSET MEDICAL PROFESSIONALS; COMMUNICATIONS WITH AUTHORITIES AND
CONTINUOUSLY FILING GRIEVANCES, DEFENDANT, FETTERMAN ACTIONS CONSTITUTED
CONSPIRACY, RETALIATION-N-FREE SPEECH VIOLATIONS PER FIRST AMENDMENT, 42 USC
1985; SEE: 52, 140, 141, 142, 265, 21, 40, 27, 338-342, 350-352, 363-369, 375, 376, 54
280. ON OR NEAR 1, 18, 19; SICK CALL; DEFENDANT, R. HUTCHINSON, DOCTOR, PENALIZED
PLAINTIFF FOR HAVING SUED DEFENDANT, HUTCHINSON-N-CO WORKERS, THE SCI-SOMER-
SET MEDICAL PROFESSIONALS, ALWAYS COMMUNICATING WITH AUTHORITIES-N-FILING
GRIEVANCES, DEFENDANT, HUTCHINSON ACTIONS CONSTITUTED RETALIATION PER 1ST
AMENDMENT, 42 USC 1985 SEE: 52, 145, 266, 21, 40, 27, 338-342, 350-352, 363-369, 375, 376, 54
281. ON OR NEAR 3, 22, 19; 4, 12, 19; 6, 17, 19; SICK CALL; DEFENDANT, D. TESTA, PROS, ACTED
IN CONCERT TO PENALIZE PLAINTIFF FOR SUING DEFENDANT, TESTA CO-WORKER, AND SCI-
SOMERSET MEDICAL PROFESSIONALS, ALWAYS FILING GRIEVANCES-N-COMMUNICATIONS
WITH AUTHORITIES, DEFENDANT, TESTA ACTIONS CONSTITUTED CONSPIRACY, RETALIATION
-N-FREE SPEECH VIOLATIONS PER FIRST AMENDMENT, 42 USC 1985; SEE 52, 153, 158, 166, 247, 21, 27,
40, 54, 338-342, 350-352, 363-369, 375, 376, 54
282. ON OR NEAR 11-7, 18; 12, 19, 18; 7, 19, 19; INTERVIEWS; DEFENDANT, E. TICE, WARDEN; ACTED IN
CONCERT TO PENALIZE PLAINTIFF FOR SUING SCI-GREENE-N-SCI-SOMERSET DOC STAFF AND
MEDICAL PROFESSIONALS, FILING GRIEVANCES, AND COMMUNICATIONS WITH AUTHORITIES,
WHEREIN DEFENDANT, TICE PARTICIPATED IN THE MISCONDUCT, OR DID NOT CORRECT OR STOP
THE MISCONDUCT OF THOSE UNDER HIS SUPERVISION, DEFENDANT, TICE ACTION-N-NON ACT-
IONS CONSTITUTED CONSPIRACY, RETALIATION-N-FREE SPEECH VIOLATIONS UNDER
FIRST AMENDMENT, 42 USC 1985; SEE: 52, 127, 209, 268, 21, 27, 40, 54, 220-224, 232, 236, 249,
268, 338-342, 350-352, 363-369, 375, 376, 31
283. ON OR NEAR 12, 24, 18; 1, 17, 19; 5, 6, 19-5, 8, 19; SICK CALL-N-ACCESS TO MEDICAL CARE, DE-
FENDANT, B. P. HYDE, HEALTH CARE ADMINISTRATOR; ACTED IN CONCERT TO PENALIZE
PLAINTIFF FOR SUING DEFENDANT, HYDE, AND SCI-SOMERSET MEDICAL PROFESSIONALS,
DOC STAFF, FILING NUMEROUS GRIEVANCES, AND COMMUNICATIONS WITH AUTHORITIES,
DEFENDANT, HYDE ACTIONS CONSTITUTED CONSPIRACY, RETALIATION-N-FREE SPEECH
VIOLATIONS PER FIRST AMENDMENT, 42 USC 1985; SEE 52, 159, 160, 141, 269, 21, 27, 39, 36,
46, 40, 338-342, 350-354, 363-369, 375, 376, 349, 31
284. PLAINTIFF HAS NO PLAIN, ADEQUATE OR COMPLETE REMEDY AT LAW TO REDRESS THE
WRONG DESCRIBED HEREIN HAS BEEN AND WILL CONTINUE TO BE IRREPARABLY INJURED BY
THE CONDUCT OF DEFENDANTS UNLESS THIS COURT GRANT THE DECLARATORY AND INJUNCT-
IVE RELIEF WHICH PLAINTIFF SEEKS.
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VII INJURY

- 285. PLAINTIFF ALLEGED AND INCORPORATE BY REFERENCE PARAGRAPHS 1-284
- 286. IRREPARABLE INJURY OF LOST OF REWARDS IN THE AFTERLIFE DUE TO DENIAL OF "DAILY" PRAISE-N-WORSHIP; AND PROSELYTIZING, STILL ONGOING TO DATE!
- 287. HEART FAILURE
- 288. BOTH FEET COVERED IN CALLUS SKIN CAUSING WALK TO BE PAINFUL
- 289. THE MANDATES OF WASHINGTON V. KLEM SETTLEMENT, SCI-SOMERSET ALREADY APPROVED OF EXCESS RELIGIOUS-N-LEGAL PROPERTY, WHICH TO DATE! HAS CAUSED PLAINTIFF "DAILY" PRACTICE OF PLAINTIFF RELIGIOUS BELIEFS TO BE IMPOSSIBLE
- 290. AFFECTS OF DIGESTIVE DISORDER, i.e. PERICARDITIS, VISION PROBLEMS, LOSS OF MUSICAL PHYSIQUE, MEMORY LOSS, LOSS OF STAMINA, ENERGY, CONCENTRATION, CIRCULATION PROBLEM, SUDDEN-N-BROSS LOSS OF WEIGHT
- 291. FURTHER LOSS OF EYESIGHT IN RIGHT EYE
- 292. PSYCHOLOGICAL DAMAGES AS RESULT OF INABILITY TO PRACTICE RELIGIOUS BELIEFS
- 293. EARLY STAGE OF DEMENTIA
- 294. LOSS OF ABILITY TO EAT-N-DIGEST VARIOUS FOODS
- 295. INABILITY TO RAISE VOICE ABOVE A WHISPER
- 296. IREVERSIBLE FOOT FUNGUS, WHICH ENTAILS BLACKENED TOE NAILS, FEET COVERED IN SKIN SO DRY IT'S LIKED UNTO ALLIGATOR HIDE, AND LARGE CALLUSES
- 297. DETERIORATION OF MUSCLES
- 298. DEFORMED ANKLES, ELBOWS, FINGERS
- 299. LOSS OF EXPENSIVE RELIGIOUS BOOKS
- 300. URETHRAL STRICTURE
- 301. DUE TO DENIAL OF MEDICAL CARE AT ALL TIMES RELEVANT THE FOR FEELING INEVITABLE WILL GET WORST

VIII. PRAYER FOR RELIEF

- 302. PLAINTIFF ALLEGED AND INCORPORATE BY REFERENCE PARAGRAPHS 1-301
- 303. IMMEDIATE PLACEMENT IN JOHNS HOPKINS OR WALTER REED HOSPITAL AND REMAIN THERE UNDER THE CARE-N-PROVIDED CARE BY SPECIALISTS UNTIL PLAINTIFF IS PERSONALLY CONVINCED ALL OF PLAINTIFF HEALTH PROBLEMS ARE CURED OR CORRECTED.
- 304. IMMEDIATE NEEDED SURGERY ON EYE OR EYES AT WILLS EYE CLINIC IN PHILADELPHIA.
- 305. IMMEDIATE MEDICAL CARE BY OPHTHALMOLOGISTS, GASTROENTEROLOGISTS, OTOLARYNGOLOGIST, UROLOGIST, CARDIOLOGISTS, DERMATOLOGISTS, PODIATRISTS AND ALL OTHER SPECIALISTS, CONDUCTED AT JOHNS HOPKINS UNIVERSITY HOSPITAL, OR WALTER REED HOSPITAL.
- 306. ALL MEDICAL CARE FREE OF CHARGE, i.e. SICK CALL, DOCTOR'S VISITS, MEDICINES FOR LIFE, INCLUDING HOSPITAL STAYS-N-SPECIALISTS
- 307. PLAINTIFF'S PERSONAL CHOICE OF A SUPPLEMENTAL DIETS, PERMANENTLY FOR LIFE
- 308. FOLLOW UP MEDICAL CARE BY SPECIALISTS CONDUCTED ON A WEEKLY BASIS
- 309. PROVIDE PLAINTIFF WITH A DOCTOR'S VISIT THREE DAYS PER WEEK FOR LIFE WITH COMPLAINTS W.V.D.

- OUT HAVING TO SUBMIT A SICK CALL REQUEST
310. MEDICAL DEPARTMENT RESPOND THE NEXT DAY WITH CARE THAT MEETS THE REQUIREMENTS OF THE EIGHTH AMENDMENT TO EACH-N-EVERY SICK CALL REQUEST
311. MEDICAL RECORDS THAT DICTATES THAT PLAINTIFFS TO BE ONLY HOUSED ON THE TOP TIER UNTIL PLAINTIFF IS CONVINCED PERSONALLY IT IS A HEALTH PROBLEM, OR PLAINTIFF REQUEST TO MOVE
312. PERMANENT Z-CODE STATUS
313. HAIR TRANSPLANT
314. NO LIMITS ON IN CELL STORAGE, AND R-N-D STORAGE SPACE
315. TO BE ENFORCED IN FACILITIES AFFILIATED WITH THE PA, DOC (INCLUDING OUT PATIENT PROGRAMS, HALFWAY HOUSES-N-MENTAL INSTITUTIONS) SHALL PROVIDE PLAINTIFF SPACE, A SPECIFIC DAY OF THE WEEK, AND TIME FOR WEEKLY WORSHIP SERVICES, AND STUDY GROUPS, AND SEAB: SELF ENHANCEMENT AWARENESS GROUP, ALL CONSISTING OF 120 MINUTES PER SESSION, ANNUAL CELEBRATIONS, AND FESTIVITIES THAT ARE RECOGNIZED BY THE CHILDREN OF THE SUN CHURCH, I.E. BLACK HISTORY MONTH, I.E. THE ENTIRE MONTH OF FEBRUARY, KWANZAA SEASON, I.E. DECEMBER 26-JANUARY 1st; AFRICAN LIBERATION-MAY 25th; JUNETEENTH; NAKUMBAKAY- NOVEMBER 11th; AND ANNUAL PICNIC; PLAINTIFF RELIGIOUS SERVICES ARE GROUNDED IN THE TEACHINGS OF THE CHILDREN OF THE SUN CHURCH. . . . THE CHILDREN OF THE SUN CHURCH GRANTED PERMANENT PERMISSION TO SPONSOR A SALE ONCE EVERY THIRTY DAYS, WHEREIN THE CHILDREN OF THE SUN CHURCH RECEIVES ONE HUNDRED PERCENT OF THE PROFITS-N-PROCEEDS, TOTAL FREEDOM TO INVITE A SPEAKER, OR GUEST SPEAKER FOR WORSHIP SERVICES-N-FESTIVITIES, PLAINTIFF WILL DECIDE.
316. PERMANENT ASSIGNMENT AS FACILITATOR FOR CHRISTIAN BLACK STUDIES GROUP, LEADER OF THE CHILDREN OF THE SUN WORSHIP SERVICES, AND THE SELF ENHANCEMENT AWARENESS GROUP; SEB; PAID JOB WITH HIGHEST POSSIBLE HOURLY RATE FOR EACH GROUP, EIGHT HOURS WORK DAY, AND SEVEN DAYS WORK WEEK
317. IMMEDIATE COMPLETE COMPLIANCE, PERMANENTLY WITH THE DICTATES OF THE WASHINGTON V. KLEM, SETTLEMENT AGREEMENT
318. A DECLARATION THAT STATES THE ACTS AND OMISSIONS DESCRIBED HEREIN VIOLATED PLAINTIFF RIGHTS UNDER PA. CONSTITUTION, ARTICLE I § 26; AND FIRST, EIGHTH AND FOURTEENTH AMENDMENTS, 42 USC 1985; 2000CC, 1-5; 18 USC 133247
319. PRELIMINARY-N-INJUNCTIVE RELIEF
320. COMPENSATORY DAMAGES IN THE AMOUNT OF \$1,000,000 AGAINST EACH DEFENDANT JOINTLY AND SEVERALLY, PER VIOLATION OF PLAINTIFF 1st, 8th, 14th, AND RU-IAN RIGHTS, AND 42 USC 1985; 18 USC 133247
321. COMPENSATORY DAMAGES FOR PSYCHOLOGICAL OR EMOTIONAL INJURY IN THE AMOUNT OF 1,000,000
322. TWENTY DOLLARS OF FREE PHOTO COPYING PER WEEK
323. A LIFE TIME SUBSCRIPTION OF PLAINTIFF CHOICE OF FOUR DIFFERENT NEWSPAPERS, MAGAZINES, NEWSLETTERS; AND A WEEKLY SUPPLY OF PLAINTIFF CHOICE OF ARTICLES
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- OF 20 SEPARATE ARTICLES, AND ONE BOOK OF PLAINTIFF CHOICE FREE OF ~~CHARGE~~ CHARGE
324. HYGIENE-N-COSMETIC (SKIN LOTION, AFTER SHAVE, SHAVING CREAM, DEODORANT, TOOTH PASTE, SOAP) OF PLAINTIFF CHOICE FREE OF CHARGE UPON REQUEST
325. PLAINTIFF CHOICE OF EYEGLASSES UPON REQUEST FREE OF CHARGE
326. PERMANENTLY ASSIGNED THE CREW OF BOTH BASKETBALL-N-SOFT BALL OFFICIALS ENFORCED IN ALL PA. PRISONS WHERE PLAINTIFF IS HOUSED, PAY GUARANTEED AT THE HIGHEST POSSIBLE PAY RATE, SEVEN DAYS WORK WEEK EVEN WHILE HOUSED IN RHU
327. PUNITIVE DAMAGES IN THE AMOUNT OF \$40,000,000 AGAINST EACH DEFENDANT JOINTLY AND SEVERALLY FOR EACH VIOLATION OF PLAINTIFF 1st, 8th, 14th, 15th, 17th, 18th, 19th, 20th, 21st, 22nd, 23rd, 24th, 25th, 26th, 27th, 28th, 29th, 30th, 31st, 32nd, 33rd, 34th, 35th, 36th, 37th, 38th, 39th, 40th, 41st, 42nd, 43rd, 44th, 45th, 46th, 47th, 48th, 49th, 50th, 51st, 52nd, 53rd, 54th, 55th, 56th, 57th, 58th, 59th, 60th, 61st, 62nd, 63rd, 64th, 65th, 66th, 67th, 68th, 69th, 70th, 71st, 72nd, 73rd, 74th, 75th, 76th, 77th, 78th, 79th, 80th, 81st, 82nd, 83rd, 84th, 85th, 86th, 87th, 88th, 89th, 90th, 91st, 92nd, 93rd, 94th, 95th, 96th, 97th, 98th, 99th, 100th, 101st, 102nd, 103rd, 104th, 105th, 106th, 107th, 108th, 109th, 110th, 111th, 112th, 113th, 114th, 115th, 116th, 117th, 118th, 119th, 120th, 121st, 122nd, 123rd, 124th, 125th, 126th, 127th, 128th, 129th, 130th, 131st, 132nd, 133rd, 134th, 135th, 136th, 137th, 138th, 139th, 140th, 141st, 142nd, 143rd, 144th, 145th, 146th, 147th, 148th, 149th, 150th, 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1882nd, 1883rd, 1884th, 1885th, 1886th

338. PLAINTIFF ALSO CONTACTED SEVERAL DIFFERENT ATTORNEYS e.g. ANGELINA BRYANT, VIC WALCZAK, LETICIA CHAVEZ-FREED, SUSAN LIN, A. SCOTT BOLDEN, BLAINE JONES, JEFFREY FIEBER, ROY BLACK, WILLIAM KUNSTER, RON KUBY, BRET BRATE, DUSTIN Mc DANIELS, COUNTLESS OTHERS

339. THIS CAUSED PA. DOC COMMISSIONER JOHN WHEZEL, PA. DOC CENTRAL OFFICE, PRISON STAFF, MEDICAL PROFESSIONALS, UNIT MANAGERS TO RETALIATE AGAINST PLAINTIFF IN THE MOST VICIOUS WAY; STILL ON GOING AT SCI-SOMERSET TO DATE!

340. DEFENDANTS, K. DELISMA, WILLIAM L. BOWERS, PHILLIP MAUST, HEIDI SROKA, ROBERT SNYDER, R. PESCHACK, J. GIBONE, ELLIS KAUFFMAN, RICHARD IRWIN, ROXANNE PLAYSO, LARENE DONNEAU, FETTERMAN, RICHARD HUTCHINSON, D. TESTA, E. TICE; B. P. HYDE ON MORE THAN TWO OCCASIONS, SOME THREE-FOUR TIMES THEY WERE GOING TO PENALIZE PLAINTIFF FOR FILING GRIEVANCES AGAINST THEM PERSONALLY, OR THEIR COWORKERS, FOR SUING DOC STAFF-N-MEDICAL PROFESSIONALS AT SCI-SOMERSET-N-SCI-GREENE, THEIR FAMILY MEMBERS, FRIENDS, NEIGHBORS, ARMY BUDDIES, etc.; CONTINUOUS COMMUNICATIONS WITH AUTHORITIES; i.e. U.S. DISTRICT COURT, D.O.J., FILING GRIEVANCES-N-REQUEST TO STAFF CONCERNING ALLEING PLAINTIFF TIMELY SUBMITTED GRIEVANCES NOT BEING RESPONDED TO, /AND OR CONCERNING ~~THEIR~~ THEIR CONTINUOUS RETALIATIONS AGAINST PLAINTIFF. SEE: 27, 31, 40, 56, 57, 60, 64, 138, 217, 218, 259-283

341. EACH DEFENDANT ROUTELY TAUNTED PLAINTIFF WITH THEIR BRAGGING-N-BOASTING OF HAVING PLAINTIFF PENALIZE ~~BECAUSE~~ PLAINTIFF TO EXPERIENCE HEART ATTACK SYMPTOMS, DENIAL OF MEDICAL CARE-RLUIPA-RELIGIOUS PRACTICE-EQUAL PROTECTION-N-FREE SPEECH RIGHTS, CONSPIRACY, RETALIATION, DENIAL OF ACCESS TO INMATE GRIEVANCES SYSTEM, DICTATES OF WASHINGTON V. KLEM SETTLEMENT SEE: 40, 52, 57, 60, 62, 150, 223, 342

342. THESE WERE NOT JUST INDIVIDUALS BLOWING OFF STEAM, EACH SCI-SOMERSET DOC STAFF MEMBERS-N-MEDICAL PROFESSIONALS CITED IN THIS LEGAL ACTION FOLLOWED UP THEIR THREATS WITH ACTION SEVERAL TIMES OVER SEE: 1-376 PARSEIM

343. PLAINTIFF EXHAUSTED ALL AVAILABLE REMEDIES PURSUANT TO DC-ADM, 804 INMATE GRIEVANCE SYSTEM, e.g. NUMEROUS TIMES PLAINTIFF SUBMITTED TWO-THREE TIMES, AND REQUEST TO STAFF BECAUSE THE INITIAL GRIEVANCES, TIMELY SUBMITTED WERE NOT RESPONDED TO. SEE: 56, 88-98, 100-105, 342

344. EACH-N-EVERY GRIEVANCE I SUBMITTED WHERE I REQUESTED MONETARY RELIEF THE GRIEVANCE COORDINATOR DID NOT RESPOND TO, SO MORE THAN TWO TIMES I ASKED CONFIDENTIALLY, WHY. THE GRIEVANCE COORDINATOR, H. SROKA RESPONDED AS IF SHE TOOK EXCEPTION TO MY ASKING SUCH A QUESTION, SHE FLAT OUT TOLD ME SHE WAS ^{NOT} GOING TO RESPOND TO EVERY GRIEVANCE WHERE I REQUESTED MONETARY RELIEF, AND MY REQUEST TO STAFF CONCERNING WHY SHE DIDNT RESPOND TO THOSE GRIEVANCES, ACCORDING TO MS. SROKA THE WARDENS, AND DEPUTY WARDENS GAVE HER DIRECT ORDERS NOT TO RESPOND SEE: 342, 347

COMPLAINT: W.V. D

345. THE WARDEN ~~AND~~ DEPUTY WARDEN DURING THE TENURE OF DEFENDANT, H. SROKA TRAVAR WINGARD-N-MELISSA HAINSWORTH, ON MORE OCCASION I MADE BOTH A ^{NOT} THAT ~~ONE~~ OF MY GRIEVANCE WHERE I'D REQUESTED MONETARY RELIEF WERE [^] SPONDED TO. DURING EACH INTERVIEW, CONDUCTED SEPARATELY FROM THE OTHER I WAS SCOLDEN-ACCUSED OF MY COMMITTING DISCORD AMONG INMATES-N-STAFF, TOLD I WAS DISOUBTEOUS, BEING DISRESPECTFUL, DISRUPTIVE, DESTRUCTIVE; ACCORDING TO THE WARDENS: WINGARD-N-HAINSWORTH, THEY BOTH HAD GIVEN THE GRIEVANCE COORDINATOR, H. SROKA, DIRECT ORDERS NOT TO RESPOND EVERY GRIEVANCE WHERE I REQUESTED MONETARY RELIEF; AND I WOULD BE WASTING MY TIME TO CONTINUE FILING GRIEVANCES REQUESTING MONETARY RELIEF

346. ACCORDING TO THE GRIEVANCE COORDINATOR, H. SROKA, DECLARED, THERE WAS ABSOLUTELY NO FAULTS OR SHORT COMINGS IN THE GRIEVANCES I'D FILED WHICH SHE ASSIGNED A GRIEVANCE TRACKING NUMBER; OTHER ^{WISE} SHE WOULD HAVE REJECTED MY GRIEVANCE, ACCORDING TO MS. SROKA, IT WAS NOT NECESSARY FOR ME TO REQUEST MONETARY RELIEF IN A GRIEVANCE, WHY COULDN'T I GET IT

347. I BELIEVE IT WOULD BE HELPFUL FOR THE COURT TO KNOW, I AM 75 PLUS YEARS OF AGE, ^{ABLE} WEAK, OFTEN IN SUCH PAIN-N-DISCOMFORT I AM UNABLE TO STAND UPRIGHT, INCAPABLE OF SPEAKING ALOUD, I DO NOT HAVE A ARMY, I AM A POOR BLACK MALE, NO FAMILY MEMBERS IN THE STATE OF PENNSYLVANIA, BOTH PARENTS NOW DECEASED, THEREFORE, I AM UNABLE TO HIRE AN ATTORNEY; AND NOBODY OF INFLUENCE TO SPEAK ON MY BEHALF, SO I CAN NOT! FORCE THE GRIEVANCE OFFICER TO RESPOND TO MY GRIEVANCES, I APPEALED TO BOTH WARDENS WHOM TOLD ME THAT I WAS WRONG FOR REQUESTING MONETARY RELIEF; AND THE GRIEVANCE COORDINATOR NOT RESPONDING TO MY GRIEVANCE WAS THE PROPER ACTION TO TAKE AND GROUNDED IN DOC POLICY DC-ADM 804; PLUS BOTH OPENLY STATED THEY'D PERSONALLY TOLD MS. SROKA NOT! TO RESPOND, I'VE DONE ALL I CAN DO, IF BOTH WARDENS, AND THE GRIEVANCE COORDINATOR HERSELF ALL ACTED IN CONCERT AGAINST ME

348. I AM NOT A HEALTHY PERSON, HAVING GONE THROUGH SIX STRAIGHT YEARS OF SHEER TORTURE, I.E. FINGERS, CARROTS, CUCUMBERS, BATON TIPS FOKED INTO MY RECTUM, DISINFECT-ENT-TO BACCO-N-SNUFF SPIT-ATCH UP SQUIRTED IN TO MY RECTUM, PUNCHED, JABBED WITH STICKS, KICKED, DENIED FOOD, MEDICAL CARE, SPAT UPON, ETC. I AM VIVIDLY AFRAID FOR LIFE, EACH TIME I FILE A GRIEVANCE I AM ATTACKED; I SUFFER; I AM 75 PLUS YEARS OF AGE, NOBODY ACTS ON MY BEHALF; SO IF ~~THE~~ WARDENS (E.TICE, M. HAINSWORTH, T. WINGARD) WON'T HELP ME, THEN A GRIEVANCE COORDINATOR CAN SUMMARILY DISCARD MY GRIEVANCES, AND I'M TOLD SHE NOT GOING TO RESPOND; I AM HELPLESS. I TRULY CANNOT FORCE THE GRIEVANCE COORDINATOR TO RESPOND TO MY GRIEVANCE, SEE: 336, 342

349. PLAINTIFF IS THE FOUNDER-N-LEADER OF THE CHILDREN OF THE SUN CHURCH, WHO EARN REWARDS IN THE AFTERLIFE BASED ON THE NUMBER OF EYES I/FOLLOWERS OPEN WITH THE TEACHINGS OF THE CHURCH CONCERNING AFRIKAN GOD, HIS NAME, AFRIKAN PEOPLE-KINGDOMS-EMPIRES-HEROINES-HEROES, ETC. THE RELIGIOUS BOOK-N-LITERATURE, AND THE RELIGION ARE ONE-N-THE SAME, SO E.TICE, W.L. BOWERS-N-P. MAUST DENY ME MY COMPLAINT: WLV: D

350. TO DATE! MY HEALTH IS RAPIDLY FAILING, I SUBMIT 2-3 SICK CALL REQUEST ON WEEKLY BASIS, RARELY ARE THE SICK CALL REQUEST RECOGNIZED AND WHEN THEY ARE I AM MOCKED, WHAT FOLLOWS IS MEDICAL PROFESSIONALS AT SCI-SOMERSET TO DATE! ARE DENYING ME MEDICAL CARE THAT IS REQUIRED BY THE EIGHTH AMENDMENT; STILL NEAR BLIND IN RIGHT EYE, SO WEAK WALKING IS TIERESOME, UNABLE TO SPEAK ALOUD, URETHRAL STRICTURE, CONTINUING DIGESTIVE PAIN, UNABLE TO EAT APPROXIMATELY EIGHTY PERCENT OF THE FOODS SERVED TO INMATES WITHOUT EXPERIENCING NON STOP EXCRUCIATING PAIN-N-EXTREME DISCOMFORT THROUGHOUT MY DIGESTIVE TRACT, etc. WITHOUT THE HELP OF THE COURT I WILL PROBABLY DIE BROKE, BLIND, HUNGRY, FULL BLOWN DEMENTIA, BLAMED FOR MY OWN DEATH.
SEE: 21; 23-26; 28; 29; 33-34; 39; 41; 59; 61; 62; 66; 80-87; 113-120; 122; 123; 128-136; 139-170; 192-211; 342; 376

351. I AM A DARK SKIN BLACK MALE WHO DEFENDANTS CONSISTANTLY SINGLE OUT FOR MOCKERY, DENY MEDICAL CARE, RELIGIOUS PRACTICE, AND BASIC HUMAN NEEDS, SPORTS OPPORTUNITIES.
SEE: 21; 26; 52; 65; 70; 112; 114; 115; 117; 120; 122; 123; 128; 132-135; 145; 148; 150; 157-159; 166; 167; 342; 376

352. WITHOUT BEING IN PLAINTIFF PRESENCE FOR WEEKS IGNORING 2-3 SICK CALL REQUEST PER WEEK, AND NUMEROUS REQUEST TO STAFF ADDRESSED TO DEFENDANT, K. DELISMA, THE MEDICAL DIRECTOR, HAVING NEVER! TOUCHED PLAINTIFF PHYSICALLY TO CONDUCT A CURSORY EXAM OF BLOOD PRESSURE, HEART RATE, BREATHING PATTERN-N-PUPIL DILATION; NO LAB TESTING OF BLOOD; URINE OR STOOL SAMPLE, OR PAP SMEAR, YET, DEFENDANT, DELISMA ORDERED HIS SUBORDINATES, i.e. NURSE PRACTITIONERS-N-PHYSICIANS ASSISTANTS, J. GIRONE, E. KAFFMAN, R. IRWIN, R. PLAYSO, L. DARLING, FEETERMAN, R. HUTCHINSON, D. TESTA; NOT TO PROVIDE ME MEDICAL CARE FOR THOSE HEALTH PROBLEMS. N.B. DEFENDANT, DELISMA HABITUALLY AVOID PHYSICAL CONTACT WITH ME FOR WEEKS, OR COMMUNICATIONS WITH ME BY MAIL OR PHONE, NOR HAD DEFENDANT, DELISMA EVER PROVIDED ME AN EXAMINATION, YET THE MEDICAL PROFESSIONALS, FORENAME TURNED ME AWAY WHILE I WAS IN NON STOP EXCRUCIATING PAIN-N-EXTREME DISCOMFORT.
SEE: 21; 25; 114; 118; 120; 122; 131; 133; 140; 143; 144; 146; 150; 154; 157; 160; 342; 376

353. SEVERAL TIMES OVER DEFENDANT, B.P. HYDE HAS BEEN MADE AWARE, AND MORE THAN TWO OCCASIONS HYDE WAS PERSONALLY CONFERRED WITH, THEN STOOD AT THE STAFF OF MEDICAL PROFESSIONALS TALKED TO ME IN A RACIST-N-BIGOTED MANNER, REFUSED TO PROVIDE ME MEDICAL CARE FOR MY SERIOUS HEALTH PROBLEMS, SENDING ME AWAY IN NON STOP EXCRUCIATING PAIN-N-EXTREME DISCOMFORT, DEFENDANT, HYDE DID NOT ATTEMPT TO STOP OR CORRECT THE RACIST-BIGOTED, AND ILLEGAL ACTIONS OF DEFENDANTS; i.e. MEDICAL PROFESSIONALS, BUT DEFENDANT, HYDE, ENCOURAGED IT, SAYING "FUCK HIM"
I WAS MOVED TO DEEP FEAR, CAUSING ME TO URINATE ON MYSELF, I AM VIVIDLY AFRAID FOR MY LIFE AND EVEN MORE SO TO BE NEAR DEFENDANTS, & MEDICAL PROFESSIONALS-N-B.P. HYDE.
SEE: 143; 149; 159-162; 249; 283; 342; 376; 21

354. WHITE INMATES ARE PROVIDED BETS ^{BY SPECIALIST} UPON REQUEST, BASED UPON NON MEDICAL REASONS, I.E. RACE, RELIGION, NOT SIGNING OFF ON GRN[#] 659236, COMMUNICATION WITH AUTHORITIES I AM BEING CONTINUOUSLY DENIED A DIET SUPPLEMENT CONSISTING OF READILY AVAILABLE FOODS AT A MINIMAL COST, AND ZERO MAN HOURS, DEFENDANTS, K. DELEMA, J. BIRONE, E. KAUFFMAN, R. IRWIN, R. PLAYS, L. DONNELLY, R. HUTCHINSON, FETTERMAN, D. TESTA, B. P. HYDE DENIED-N-CONTINUOUSLY DENY MR. CARE BY SPECIALIST-N-MEDICINES ALREADY ORDERED BY DOCTORS AND RECOMMENDED BY SPECIALIST
 SEE: 21; 25; 26; 30; 64; 67; 70; 71; 73; 336; 342; 366; 376

355. I AM CONTINUOUSLY HAUNTED BY SATAN, AND NABBED BY EVIL SPIRITS DUE TO THE FACT I HAVE BEEN RENDERED UNABLE TO PRACTICE MY RELIGIOUS BELIEFS, DUE DEFENDANTS, P. MAUST, W. L. BOWERS, AND R. SNYDER DENAL OF RELIGIOUS LITERATURE C, F, THE DAILY PRACTICE OF MY RELIGIOUS BELIEFS PROVIDED ME WITH A BARRIER WHERE THE SPIRIT OF THE DEVIL-N- SATAN AVOIDED ME. ^{SEE: 30; 41; 54; 59; 214; 217; 21-47; 48; 54; 181-186; 215-217; 215-258; 271; 272; 273; 349; 351; 356}

356. I HAVE DEMENTIA, WHICH IS IN ITS EARLY STAGE, MY RELIGIOUS PRACTICE AND THE LOCATION OF THE CELL I AM ASSIGNED TO ARE TWO CRUCIAL COMPONENTS THAT PROVIDES ME ^{SOME} MEASURES OF STABILITY, TO DATE! I AM BEING DENIED MY RELIGIOUS PRACTICE, AND "FORCED" TO HOUSE IN A LOCATION THAT DEPRIVES ME OF ALL SERENITY WHICH IS CAUSING ME A CONTINUOUS MENTAL STRUGGLE; WITH NUMEROUS COMPATIBLE CELLS AVAILABLE, DURING 10.6.17 - FEBRUARY 2019 SPAND, WHITE INMATES ARE NOT ASSIGNED TO THE CELL I WAS FORCED! TO HOUSE FOR 420 PLUS STRAIGHT DAYS, DUE TO THE LOCATION OF THE CELL. IN THE PAST I WAS MOVED OUT OF THE "EXACT SAME CELL" DUE TO THE PSYCHOLOGICAL AFFECT I EXPERIENCED. DEFENDANT, WIL. BOWERS WAS AWARE OF ALL OF THE FOREMENTIONED INFORMATION PRIOR TO ASSIGNING ME TO THE CELL; STILL DEFENDANT, BOWERS DISREGARDED THE RISK TO MY MENTAL HEALTH, STILL ASSIGNED ME TO THAT CELL. DEFENDANT, BOWERS DISREGARDED THE FOREMENTIONED INFORMATION PROVIDED TO HIM BY MORE THAN THREE PSYCHOLOGISTS; AND TWO PSYCHIATRISTS, WITHOM SUCINCTLY TOLD DEFENDANT, BOWERS THAT I AM BEING PERMANENTLY DAMAGED PSYCHOLOGICALLY DUT TO WHERE I WAS BE HOUSED FORCEFULLY. DEFENDANT, BOWERS RESPONSE, WASHINGTON'S ANCESTORS LIVED IN HUTS, SO WHAT IS THE BIG DEAL, WHITE INMATES ARE READILY PLACED IN THE NUMEROUS AVAILABLE COMPATIBLE CELL UPON REQUEST WHILE I ^{WAS} DURING THE 10.16.17 - FEBRUARY 2019 SPAND BEING DENIED BASED ON NON PENOLOGICAL INTEREST, I.E. RACE, RELIGIOUS BELIEFS, NOT SIGNING OFF ON GRN[#] 659236, COMMUNICATION WITH THE AUTHORITIES
 SEE: 21; 106-112; 121; 174; 175; 177-179; 342; 363-368; 375; 376

357. WHEN I SPOKE TO GRIEVANCE OFFICER, H. SROKA, I ALSO SHOWED HER MY FEET WHICH EXHIBITED MY TOE NAILS ALL BLACKENED, DISCHARGING PUS-N-BLOOD, DEFENDANT, SROKA RESPONSE WAS "MY GOD! YOU NEED TO RE SEEN BY A DOCTOR", "YOU NEED A DOCTOR'S CARE", IT IS YOUR OWN FAULT, "STOP YOUR SUING-N-FILING GRIEVANCES REQUEST-MONETARY RELIEF", AND "THEN YOU GET THE MEDICAL CARE YOU NEED. SEE: 104; 245; 21; 342
 COMPLAINT: W.V.D. (42)

358. TO DATE! DEFENDANT, R. PESCHOCK, INTENTIONALLY TREATS ME AS A CLASS OF ONE FOR NO RATIONAL REASON, BASED ON NON PENOLOGICAL REASONS, MY FILING A GRIEVANCE AGAINST HER, DEFENDANT, PESCHOCK, e.g. REMOVING ME FROM MY OFFICIATING JOB ROLE SOLELY BECAUSE HER PET/FAVORITE OFFICIAL DID NOT WANT TO BE PLACED IN AN ASSIGNMENT THAT REQUIRED MORE PHYSICAL MOVEMENT, THEN ASSIGN ME TO THE ASSIGNMENT HE DIDN'T WANT. N.B. THE ASSIGNMENT I WAS REMOVED AWAY FROM I PERFORMED VERY EFFICIENTLY, AND THE ASSIGNMENT HER FAVORITE CHOSE TO AVOID CAN PERFORM SUFFICIENTLY. ^{SP# 21; 187-191; 273; 27; 40; 337-342; 172; 173; 375; 376}

359. TO DATE! DEFENDANT, R. PESCHOCK REGULARLY INSULT ME, e.g. TO PENALIZE ME FOR MY SUING HER, FILING GRIEVANCE AGAINST HER, DEFENDANT, PESCHOCK PERMOTES FIRST-SECOND YEAR; OR NOVICE TO RULES I HAVE ADEQUATELY PERFORMED FOR MORE THAN FOUR ~~DEC~~ DECADES; GIVING SUCH INDIVIDUALS TWICE THE WORK HOURS-N-PAY I AM ALLOWED ALTHOUGH I AM FULLY CAPABLE OF PERFORMING JOB ROLE THESE LESS KNOWLEDGEABLE-N-SKILLED OFFICIALS ARE CURRENTLY BEING ASSIGNED. DEFENDANT, PESCHOCK ACT OF RETALIATION IS TREATING ME AS A CLASS OF ONE; AND ABE-RELATED,

360. TO DATE! DEFENDANT, PESCHOCK ACTS TO PUNISH PLAINTIFF FOR HAVING SUED HER-N-FILING A GRIEVANCE AGAINST HER. THE FACT THAT EVERY WRITTEN TEST OR ORAL, AND LIVE TEST ~~GIVEN~~ TO DATE! IN THE SPORTS OF BASKETBALL, SOFTBALL, VOLLEYBALL, AND FLAG FOOTBALL I HAVE SCORED THE HIGHEST-OR AMONG THE HIGHEST; AND IT IS A RARITY THAT GIVE AN INCORRECT RESPONSE.

N.B. SOLELY TO PENALIZE ME DEFENDANT, R. ~~PESCHOCK~~ PESCHOCK IGNORE-N-DISREGARD THE OBVIOUS MISTAKE OF OTHERS, THEN PASS JUDGMENT IN HARSH DEGREE AGAINST ME FOR THE EXACT SAME MISTAKE, WHICH I SELDOM MAKE; EVEN DECLARING ME TO BE JUST ANOTHER OFFICIAL, WHILE DECLARING MORE THAN ONE OFFICIAL TO BE HER MAIN FOUR OFFICIAL, WHOM SKILLS, KNOWLEDGE OF THE GAME-N-EXPERIENCE. DEFENDANT, PESCHOCK ACTIONS WITTINGLY-N-UNWITTINGLY FOSTER-N-SUPPORT, AS WELL AS ADVANCES A CLICK-RELIGIOUS AFFILIATION-GEORGAPHIC AFFILIATION

361. PRIOR TO MY BEING IMPRISONED MY PARTTIME JOB WAS OFFICIATING SOFTBALL AND BASKETBALL, WITHIN THE PRISON SYSTEM I OFFICIATED BASKETBALL, SOFTBALL-FOOTBALL-N-VOLLEYBALL; TO DATE! 41 YEARS INSIDE OF THE PRISON SYSTEM, I AM NOT ORIGINALLY FROM THE STATE OF PENNSYLVANIA, NOT ORIGINALLY FROM PHILADELPHIA, NOT ^{IN A} HOMOSEXUAL RELATIONSHIP, NOT A MUSLIM, NOT AFFILIATED WITH A PRISON GANG, AND I AM NOT A PART OF A CLICK, ALL OF THE OTHER OFFICIALS CONSIST OF INMATES FROM PENNSYLVANIA THE MAJORITY ARE NATIVES TO PHILADELPHIA, COMMONLY FROM THE SAME AREA OF PHILADELPHIA, 95% OF THE OFFICIALS ARE INVOLVED IN HOMOSEXUAL RELATIONSHIP; MOST ARE MUSLIM, WITH THE EXCEPTION OF MYSELF, ALL ARE A PART OF CLICK, THIS MAKES ME THE ODD MAN OUT. . . . THE SOFTBALL, BASKETBALL, FOOTBALL-AND VOLLEYBALL OFFICIATING GROUPS ARE SELECTED-N-ASSIGNED TO MOST DESIRABLE ROLES, AND AFFORDED MORE

COMPLAINT: W.V. D